

## Global Speak Up Policy

### 1. Purpose

To ensure that:

- Legitimate concerns or issues are raised promptly without fear of retaliation.
- We minimise the impact of any potential wrongdoing and implement appropriate remedial measures.

### 2. Definitions

Word	Definition
<b>Ethics Panel</b>	Members of the Group Leadership Team and other senior leaders who evaluate Speak Up matters, trends, patterns and recommend remedial measures where appropriate. Established by the JM Plc board.
<b>Speak Up / Speaking Up</b>	The formal process of workers or stakeholders raising legitimate concerns at JM, which are recorded in JM's Speak Up case management system.
<b>Stakeholders</b>	Includes customers, suppliers, third party partners, investors, local community members or any other persons with a connection to JM.
<b>You</b>	Means workers or stakeholders.
<b>Workers</b>	Includes senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff, and volunteers.

### 3. Policy

#### 3.1 General Principles

- A Speak Up should be raised when you know or suspect something is unlawful, unsafe or contrary to our Code of Ethics.
- We have a zero-tolerance policy for retaliation towards anyone for raising a Speak Up in good faith or helping with an investigation. Retaliation is treated as a disciplinary matter for JM workers.
- We treat all Speak Ups confidentially. This means they will only be shared with a limited number of people on a strict need-to-know basis (subject to any local law requirements).
- We strongly encourage people filing Speak Ups to identify themselves to the case team so investigators can contact them directly where follow-up information is needed. However, where local law permits, Speak Ups can be made anonymously.
- All Speak Ups must be raised in good faith.
- You must not knowingly or intentionally make false allegations via Speak Up. Doing so could lead to disciplinary action if you are a worker.
- You should not use Speak Up for grievances or personal disputes (unless there is a legitimate reason why the channels in the Working Together Policy cannot be utilised).
- Group Ethics and Compliance will oversee all Speak Ups and report into Ethics Panel except where they are conflicted out in which case it will be referred to the Ethics Panel or Audit Committee directly as appropriate.

#### 3.2 Speak Up Channels

- Internal Speak Up channels for workers include:
  - [Your manager](#) - As a general guideline, this is the first person to approach when you have a Speak Up unless they are compromised or you are uncomfortable doing so.

- [Human Resources, Legal Adviser, Group Ethics and Compliance](#) - Where your Speak Up is within the expertise of these functions.
- [Other functions](#) - Where your Speak Up is within the expertise of another function, such as EHS, you can raise it with your local or Group contact in these functions.
- [Ethics Ambassadors](#) - You can Speak Up to your Ethics Ambassador.
- Speak Up line for workers and any stakeholders:
  - Hosted by an independent third party – reports can be submitted by telephone or on-line.
  - Available in local languages at the sites where we operate.
  - Operates 24/7, 365 days a year. Visit [www.JM.ethicspoint.com](http://www.JM.ethicspoint.com) for further details.
  - If you file a report anonymously, please check the website or call the telephone line **within 5 days of making your report** and regularly thereafter – this will be the only way we can contact you.
- You are strongly encouraged to raise your concern internally via one of the channels mentioned above. However, you can report your concern to an external party where you believe our internal channels are compromised, you do not expect them to operate properly in the circumstances or where you have raised a concern internally and we have not responded in a reasonable timeframe.