

ace & tate

Speak up

policy



Version

1.0

Effective date

December 2023

Applicable to

All partners to Ace & Tate

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Speak up policy

1. Introduction

Ace and Tate Holding B.V. and its subsidiaries ("**Ace & Tate**", "**we**", "**us**", "**our**") is committed to conducting business based on our values, acting responsible, communicating transparently and being inclusive. We strive for a culture of openness, transparency and equality. We like to play fair.

Our relationship and commitment to conduct good business with one another begins with respecting all local law and regulations. We formalise our relationships with a framework agreement and by committing to the Ace & Tate Supplier Code of Conduct.

In our day-to-day we all set off to work with the intention to do our job well. Sometimes we face obstacles, difficult choices and dilemmas. You may be able to talk about them with your colleagues, manager, local union or non-governmental organisation to have them straightened out and discuss them fairly.

The purpose of this Speak Up Policy ("**Speak Up Policy**") is to explain to you when, how and where you, as our partner or partner's employee, can raise concerns about suspected misconduct. For example when talking about suspected misconduct with your colleagues, manager, local union or non-governmental organisations ('NGO') for any reason whatsoever is not possible or not working out for you. It also describes what you can expect from Ace & Tate when you speak up, the steps that Ace & Tate will take for you and how Ace & Tate will work together with you to find solutions for the raised concern.

By introducing and offering this Speak Up Policy to all our stakeholders, we hope to contribute to the happiness and wellbeing of everyone involved.

2. We encourage you to speak up

As someone with a working relation to Ace & Tate, such as a partner or a partner's employee, we encourage you to speak your mind and work together on improving any part of our business. When you speak up, we believe it is essential to ensure a healthy and safe work environment as it takes a lot of courage to do so.

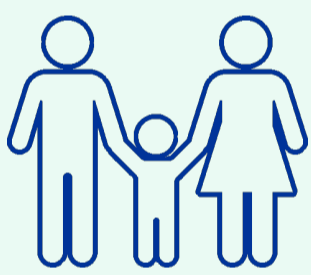
This Speak Up Policy is here to help you raise concerns that might be difficult to solve internally or on your own. When and if there are any concerns brought to our attention, always remember: you help us help you.

3. For whom is this Speak Up Policy?

We invite all our partners, their employees, our contractors, freelancers, agents, shareholders and all others performing functions and other stakeholders in relation to Ace & Tate to speak up when having concerns or suspecting misconduct.

4. What are the subjects to speak up about?

You may raise concerns if you suspect misconduct in regards to our company values (which can be found in our Code of Conduct) in case it may concern the health and safety of any person or if you suspect the requirements of the law are not being followed. For example, situations like:



Child labour



Forced labour



Discrimination, harassment or abuse



No freedom of association and collective bargaining



Disrespectful and unsafe employment relationships



Unfair or unlawful living wages



Unreasonable or unlawful working hours and no overtime compensation



Unsafe and unhealthy work environment



Privacy violations



Corruption and bribery

PLEASE NOTE - This Speak Up Policy is not a programme where you should raise questions or if you have issues with your employment conditions, performance reviews or any type of personal grievance.

Please turn to your manager or your local HR to help you solve such matters.

5. How can you speak up?

In some cases, it is always best to start close to home when you speak up. It gives the people involved and yourself the opportunity to work things out face to face and it will help create an open and transparent atmosphere in your work environment.

That is why we encourage you to first speak with for example the people involved, your manager, HR or a confidential counsellor. There should always be a safe environment provided within your company to speak up when having concerns or suspecting a misconduct. If this is not possible or does not work for you for any reason whatsoever, check if you are able to discuss any concerns you have with a local union or an NGO.

If going to your colleagues, your manager, a confidential counsellor, HR, the local union or a NGO is not an option, we offer you the opportunity to speak up using this Speak Up Policy.

The Speak Up Policy offers a service with a system (platform), operated by a third (independent) party who processes and is responsible for all messages that come in via the platform. They will handle every matter with strict confidentiality

6. How to use the system to speak up & how to prepare

You can choose to leave a (new) message via the Speak Up phone, web system or phone app. We advise that you write down your message beforehand; this way you are sure about the information you are about to give and that your message is clear and to the point.



Speak Up phone: please dial the number as set out in [Annex I \(Contact Details\)](#)



Speak Up web: please go to the URL as set out in [Annex I \(Contact Details\)](#)



Speak Up **phone app** system, you can download the SpeakUp® mobile app available for IOS or Android by searching it in your mobile app store application or scanning the following QR code with your device's camera:



You will be asked to enter the following access code: 104960. Select the language in which you would like to leave your message.

Have a pen ready when leaving the message. You will receive a personal six digit case number, which is randomly generated. It is very important that you write this down, as you need it to check the response from Ace & Tate when you come back to the Speak Up Policy later. If you use the Speak Up phone system, make sure to pronounce clearly, and ideally spell out names and locations. If you are finished, simply hang up. If you use the Speak Up web system, you can type in or simply copy/paste your message. It also allows you to upload documents to your message. When you are finished, you can press the 'send message' button; a screen with your case number and message will appear, which can be easily printed out.

7. What happens in the meantime

The moment you hang up the phone or you have sent your message, the system starts the translation of the message into English (if necessary). If you submitted a phone message, the recorded sound file will be written down word by word first. The recorded sound file will never be handed over to Ace & Tate, the company you work for or any other company involved. Once the transcription and translation is done, the exact message - both in the original language as in English - will be sent to Ace & Tate. Ace & Tate's Speak Up Representatives will acknowledge receipt within 7 working days, evaluate the message and send a first response to you via the system within 3 weeks after Ace & Tate receives the raised concern.

8. The response

The response will be ready for you on the Speak Up system as soon as possible, but ultimately within 12 weeks after you have initially made a report. You can find this response via the same way you have left your message, using the dial-in details mentioned previously. Note that it is possible to switch from phone to web at a later stage, but you can never switch from web to phone. To check your reply, you will be asked to press 1 if you already have a case number. To hear your response, press 1 and enter your case number. After you have heard your response, you can immediately post a new follow-up message; if you need some additional time to think, you can simply hang up/log out and come back another time. If you notice that a response has not been left for you yet, please be assured that the message is being reviewed and that a response will be available for you in a few working days. It is wise to check for a response regularly.

9. Investigating the concern raised

We aim to provide you with an update in writing about the status of the ongoing investigation within 8 weeks after Ace & Tate received the raised report. If there is no conclusive update to be shared until then, you will be informed about a new date on which you will receive an update, but ultimately after 12 weeks after your initial report.

10. Involved persons

If you work for a company that has a designated Local Representative who will serve as the primary contact for Ace & Tate, Ace & Tate will inform the Local Representative about raised concerns. Ace & Tate will provide assistance and support in determining the necessary steps to address those concerns. Ace & Tate will collaborate and support your company to find the optimal solution and ensure preventive measures are in place to avoid a recurrence. Your identity will not be disclosed to the Local Representative.

When a case regards a specific person, they will be informed as soon as possible about the suspected misconduct unless and to the extent this can be expected to seriously hinder the investigation and, as a result, hinder the enforcements of Ace & Tate's rights in the framework of legal proceedings. In the event the person involved cannot be informed immediately or completely, they will be (further) informed as soon as the investigation so permits. As soon as the situation allows, the person in question will be informed or interviewed in order to come to a conclusive, fair and well-rounded decision and final report.

11. Measures will be taken when needed

In case your raised concern is partially or fully founded and verified, advice will be given to appropriate management level on measures to be taken. These measures are for example disciplinary measures to be taken on personal or organisational level to prevent any (structural) incidents from recurring. Ace & Tate's Speak Up Representative will also monitor the execution of such measures. Any discrepancies between the advice given and the measures carried out must be approved in advance by Ace & Tate's Speak Up Representatives.

12. What if you are not happy with the decision or judgement?

In case, after careful consideration, you feel that your concern has not been handled professionally or the investigation was not performed correctly please inform your Local Representative or connect once more to the Speak Up platform via phone or web. Make sure to mention your old unique case number and concerns about the final decision or judgement. Ace & Tate Speak Up Representatives will acknowledge receipt within 7 working days. They will assess if the concern must be reinvestigated and send a response to you via the system within 3 weeks after Ace & Tate receives the raised concern and if any further steps will be taken or not. Also, your feedback will assist us on improving our Speak Up Policy.

13. Personal protection and anonymity

Ace & Tate will not tolerate any negative repercussions after raising a concern in good faith. There shall be no retaliation and you will not be put at a disadvantage. In case you feel punished or treated unfairly due to raising a concern please inform us via your Local Representative or by following the steps of our Speak Up Policy. If needed, we will take steps, for example advising local management to ensure disciplinary measures are taken against the offender(s).

All reports will be handled 100% confidentially. When you report via the web or phone service you will remain completely anonymous. However, in certain situations, the Local Representative or Ace & Tate representatives might request your identity to facilitate effective remediation. Please be assured your identity will never be disclosed by your Local Representative or the Ace & Tate Representatives without your explicit consent.

There are however some exceptions on remaining completely anonymous.

This is when:

- * disclosure is required by law; or
- * you submitted a concern in bad faith; or
- * it is not possible to cover your identity considering the nature or content of the concern.

14. Privacy protection

Ace & Tate will handle personal data in accordance with the in strict compliance with the European General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR') and only for purposes disclosed in this Speak Up Policy. Such data will only be provided to those who need to know after your explicit permission, when this is required by law or when an important public interest is at stake. Ace & Tate is responsible for the processing personal data in the context of this Speak Up Policy. SpeakUp® will only process personal data as per instruction of the Ace & Tate Representatives.



Frequently asked questions

If you have any further questions about this Speak Up Programme, take a look at **Annex II (Frequently Asked Questions)** or **contact** your Local Representative. Contact details can be found in **Annex I (Contact Details - Web and phone service per country)**.

ANNEX I

Contact Details – Web and phone service per country

AUSTRIA

Phone: 0800909683

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: German

Language Option 2: English

BELGIUM

Phone: 080089326

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Flemish

Language Option 2: French

Language Option 3: English

DENMARK

Phone: 00454331096 1

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Danish

Language Option 2: English

GERMANY

Phone: 08001818952

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: German

Language Option 2: English

IRELAND

Phone: 1800800636

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: English

THE NETHERLANDS

Phone: 0031107007503

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Dutch

Language Option 2: English

SPAIN

Phone: 0034900031156

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Spanish

Language Option 2: English

ANNEX I

Contact Details – Web and phone service per country

SWEDEN

Phone: 0201604703

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Swedish

Language Option 2: English

SWITZERLAND

Phone: 0800005691

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: German

Language Option 2: French

Language Option 3: Italian

Language Option 4: English

UNITED KINGDOM

Phone: 08000224118

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: English

CAMBODIA

Phone: 1800 209 867

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Khmer

Language Option 2: English

Language Option 3: French

CHINA

Phone: 400 120 1842

If you are calling with provider China United Network: 1080 0852 2221

If you are calling with provider Telecom: 1080 0152 3042

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Mandarin Simplified

Language Option 2: Cantonese Simplified

Language Option 3: English

HONG KONG SAR, GREATER CHINA

Phone: 00852 3019 4193

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Cantonese Traditional

Language Option 2: Mandarin Traditional

Language Option 3: English

ANNEX I

Contact Details – Web and phone service per country

HUNGARY

Phone: 06 809 845 89

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Hungarian

Language Option 2: English

ITALY

Phone: 800 147 694

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Italian

Language Option 2: English

JAPAN

Phone: 0081 3 6627 0734

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Japanese

Language Option 2: English

SINGAPORE

Phone: 0065 6403 7051

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: English

Language Option 2: Malay

Language Option 3: Mandarin Traditional

THAILAND

Phone: 0066 2 844 9693

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Thai

Language Option 2: English

VIETNAM

Phone: 008419003271

Web URL: <https://aceandtate.speakup.report/speakup>

Access code: 104960

Language Option 1: Vietnamese

Language Option 2: English

ANNEX II

Frequently asked questions

Will my voice be heard by the Ace & Tate or company I work for?

No. The Speak Up phone and web systems are operated by SpeakUp®, an independent third party that transcribes and translates your message and sends the Ace & Tate Representative a typed word-for-word transcript of what you said. Tip: if you do not feel comfortable leaving a phone message, have someone else read out your message on the phone system or leave a message on the web system.

Can Ace & Tate or the company I work for trace my connection data?

No, the Speak Up platform is operated by an independent third party (SpeakUp®). Nor Ace & Tate, nor the company you work for have access to the connection data. Phone details or IP-addresses will never be handed over to them. However, it could be that the company you work for traces user information from your company telephone or computer. Please note that you can use a public or non-identifiable telephone or computer as well, to prevent this.

What happens with the recording of my message?

Upon confirmation of receipt of the transcribed and/or translated message, the recording will be erased immediately by SpeakUp®. Ace & Tate nor the company you work for will have access to the recording.

Will confidentiality ever be broken?

All reports will be handled 100% confidentially. When you report via the Speak Up web or phone service you will remain completely anonymous. There are however some exceptions to remaining completely anonymous. This is when:

- disclosure is required by law; or
- you submitted a concern in bad faith; or
- it is not possible for the Ace & Tate Representative to investigate the report without knowing your identity, considering the nature or content of the concern; or
- If the Speak Up system receives a message whereby the caller is threatening violence or a criminal act, the company can request to retain the recording to hand it over to the authorities. Still, the voice file and/or connection data will never be handed over to the Ace & Tate Representative or the company you work for.

Who is paying for my call?

Access is via a free phone number so you will call at no cost. However, it can be that in exceptional cases (for some mobile operators for instance) local costs will apply which are for your own account.

Is there a limit on the length of message I can leave?

No. After seven (7) minutes you will only get a notification followed by an option to continue. Tip: try to be as comprehensive and to the point as possible in your message.

What do I need to do when the Speak Up phone system is not accessible?

If you have tried calling from a mobile phone, then please try again using a fixed landline, this is the best way to reach the Speak Up phone system. If you still encounter problems accessing the Speak Up phone system, send an email to support@speakup.com. Your name, contact details or other sensitive information will never be handed over to Ace & Tate or your employer.

How quickly will my message be passed on to Ace & Tate?

Your transcribed message will be sent to Ace & Tate, in principle, within one (1) working day.

Who at Ace & Tate receives my message?

One of the Ace & Tate Representatives.

I want to remain anonymous, but would like to receive a response; is that possible?

The Speak Up system will give you a unique case number. Please make sure to write this down carefully. This case number enables you to listen to or read the response from the company when you return to the system.

How quickly can I check for a response?

You will receive a confirmation of receipt within 7 days. The Ace & Tate Representative strives to respond as soon as possible, but at least within 3 months.

Can I call the Speak Up phone system at any time?

Yes, the Speak Up web system, Speak Up phone system and Speak Up phone app are available 24 hours per day and 365 days a year from every telephone. Each country has its own free phone number.

Can I leave a message in my native language?

Yes, you can leave a message in your native language. When leaving your message, you can simply choose one of these languages. Responses from the Speak Up platform will be in your native language as well.

Can I leave documents?

Yes, the Speak Up web system enables you to attach (electronic) documents. When you leave a message through the Speak Up phone system, you can log on to the web system using the same case number. Press on the button 'if you already have a case number'. Here you can leave your (electronic) documents. If you would like to stay anonymous, please make sure your contact details are not mentioned in the attachments or in its properties.

What if I don't remember my case number?

If you have lost your case number, we ask you to leave your message again with a new case number. If you had written down your message for your first call, this will not take up much of your time. Use the new case number for all further communication.

I do not know where to find the information to leave a message. Where can I find this?

Please see paragraph 7 of the Policy.

What is personal data and is my personal data protected by law if I leave a message through the Speak Up system?

Personal data is (in short) information that can be used to (directly or indirectly) identify an individual (e.g. name, address, picture, phone number), which could be yourself or another person mentioned in your message. The processing of personal data through the Speak Up Platform is strictly regulated (under the General Data Protection Regulation (GDPR)).

What are my rights if I leave a message containing my personal data through Speak Up?

Ace & Tate is responsible for assuring your rights under the GDPR, which include right to access, right to correction, right deletion/'to be forgotten', right to restriction of processing, right to data portability, right to object and right to file a complaint with the responsible supervisory authority. Internal policies at the company should clarify how you can exercise these rights. Ace & Tate will also notify the relevant person if a so-called 'personal data breach' occurs in case there is a high risk to the rights and freedoms of that person.

Why is my consent to process any personal data not requested when I leave a message in the Speak Up system?

Employees are (in general) not considered to be in a position to freely give, refuse or revoke consent, because there is a dependency resulting from the relationship employee/employer. Any personal data included in a message that is processed through the Speak Up platform, is processed on the ground that it is necessary for the purpose of detecting misconduct that otherwise would not be detected.