

GLOBAL SPEAK UP POLICY

WHY DO WE HAVE THIS POLICY?

We believe that honest, ethical and transparent business conduct is essential to our long-term success and continued good reputation. Genus values Speaking Up and we are committed to a culture where raising concerns is welcomed and supported. You are encouraged to come forward and report any genuine concerns through the reporting channels outlined in this policy. When you Speak Up, you can be confident that we will listen and take your concerns seriously.

Genus champions an ethical and responsible culture that is safe and inclusive for us all, not only to prevent situations of wrongdoing or misconduct from arising, but also to ensure they are identified and addressed in a timely manner when they do.

This policy sets out what to do if you know or suspect wrongdoing has occurred or is about to occur. It explains the types of concerns you can report, the reporting channels available to you, what happens after you make a report, and our commitment that retaliation against anyone who reports in good faith will not be tolerated.

Many of the countries in which we operate have laws that protect those who raise concerns about wrongdoing from detrimental treatment. This policy is designed to complement those legal protections and to provide accessible channels for raising concerns internally. If you have any questions, contact Compliance at compliance@genusplc.com for a confidential discussion.

KEY TAKEAWAYS

Genus will take your concerns seriously.

There are several channels of reporting available to you – the choice is yours.

You will be protected if you Speak Up. Retaliation against anyone who makes a report in good faith, even if it proves to be unfounded or incorrect, is prohibited.

SCOPE

The Framework applies to the following:

Everyone working for, engaged by or serving on the board of Genus plc or any of its subsidiaries worldwide (including PIC and ABS) is within scope, without exception. This includes, without limitation, all executive and non-executive directors, corporate officers, members of senior management, employees (whether permanent, temporary or fixed term), agency workers and contractors, irrespective of their role, seniority or location.

All **agents, consultants, distributors and other third parties** who act for or on behalf of Genus.

All **joint venture partners** in respect of which Genus exercises management responsibility or operational control, and

All **business activities, transactions and relationships undertaken** by or on behalf of the Group.

WHAT CAN YOU REPORT?

For the avoidance of doubt, this policy is not intended to replace the Genus Global Grievance Policy or other employment or labour related policies. If you have experienced a personal grievance during your employment, or wish to raise an employment related dispute, please raise this in accordance with the Genus Grievance Policy or contact your HR Business Partner for guidance.

TYPES OF CONCERN

If you genuinely suspect or know that wrongdoing or misconduct has occurred or is likely to occur, then you should report it. This could include wrongdoing or misconduct related to:

- Criminal conduct or activity
- Corruption, bribery or unethical behaviour
- Breach of laws or regulations
- Animal welfare, wellbeing or biosecurity
- Health and Safety
- Conflicts of Interest
- Fraud, insider trading or financial or accounting irregularity or mismanagement
- Breach of our policies and procedures

- Discrimination
- Conduct or behaviour that may damage Genus' good reputation, or
- Attempts to conceal any of the above matters.

If in doubt about the types of matter that you can report, we encourage you to report and let Compliance make the assessment.

HOW TO SPEAK UP

There are several channels for reporting concerns available to you. In many cases, we hope that you will feel comfortable raising your concern directly with your Line Manager, Function or Business Leader, Human Resources Business Partner, the General Counsel & Company Secretary or Compliance, whether in person or in writing. This can often be the quickest and most effective way to resolve the matter. Genus also has dedicated channels for reporting concerns relating to animal welfare and health and safety matters, which are set out below.

If you would prefer not to use these channels, you can also report your concern through EthicsPoint, our independent and confidential reporting service. You will find instructions for use provided below. The choice of how to report is entirely yours, including whether to do so anonymously, where permitted by local law.

ADDITIONAL REPORTING CHANNELS

Health & Safety has a dedicated internal reporting form for reporting H&S concerns. PIC has a dedicated internal reporting form and QR Code for reporting animal welfare concerns. EthicsPoint can be accessed by telephone, website, app or QR code. EthicsPoint is easy to use and instructions are provided.

Accessibility options for all additional reporting channels are linked in Guidance Notes 2 -EthicsPoint and other internal reporting.

WHAT HAPPENS AFTER YOU MAKE A REPORT?

Genus is committed to reviewing and investigating all reports raised through the channels available to you. Below illustrates the process that typically follows once a report is made. The nature of the report will govern who reviews and investigates.

REPORT RECEIVED

Reports made through EthicsPoint will be received directly by Compliance. Reports made through other channels (for example, to a HR Business Partner) will be initially reviewed by the recipient. Where possible, the recipient should notify Compliance so that the report can be logged and tracked. The person or function receiving the report will acknowledge receipt to the reporter.

REVIEW AND INVESTIGATION

The person or function receiving the report will conduct an initial review to determine the appropriate course of action. Where the report was made through EthicsPoint, Compliance may request additional information from the reporter using the messaging function, even where the report was made anonymously. Following the initial review, one of the following outcomes will apply:

INVESTIGATION LAUNCHED

Where an investigation is required, it will be conducted by the appropriate function – whether Compliance, Human Resources or another department. The reporter will be informed that an investigation is underway. Once the investigation is complete, findings will be documented and, where required, remedial actions will be identified and allocated to an appropriate owner. Progress on remedial actions will be tracked through to completion, and feedback will be provided to the reporter, where appropriate, or

NO INVESTIGATION REQUIRED

Where the initial review determines that a formal investigation is not required, the matter will be documented, and the reporter will receive feedback explaining the outcome.

CLOSURE

In all cases, the matter will be closed once it has been concluded and feedback has been provided to the reporter.

CONFIDENTIALITY

We will take all reasonable steps to protect the confidentiality of anyone who Speaks Up, although this may not always be possible, for example, where a report leads to legal proceedings. Details of any report, and any investigation findings that follow, will only be shared on a strict need to know basis, preserving the anonymity of the reporter wherever we can. If you choose to report anonymously through EthicsPoint, your identity will remain unknown to us. Above all, we want you to feel safe and supported in Speaking Up, and we are committed to making that possible.

TRAINING

You must complete all required Speak Up training assigned to you. Training helps you understand how to recognise concerns, how to report them, and what protections are available to you. Your completion of training will be recorded.

PROTECTION FOR THOSE WHO SPEAK UP

No one should suffer any form of detrimental treatment because of Speaking Up. Detrimental treatment includes dismissal, disciplinary action, demotion, harassment and intimidation. Anyone found to have retaliated will themselves be subject to disciplinary action, up to and including termination of employment.

This protection applies to reports made in good faith. Speaking Up in good faith means that you honestly believe there is wrongdoing or misconduct to report, even if it turns out you are mistaken. Protection does not extend to reporters who make knowingly false or malicious reports. Any person who makes a report that they know to be untrue may themselves be subject to disciplinary action.

All reports will be reviewed or investigated in a manner that is fair, independent and proportionate. Any person who is the subject of a report will be treated fairly and given the opportunity to respond to allegations at an appropriate stage. Further details of the investigation framework are set out in the Group Compliance Investigation Protocol (which you can find at Annex 6).

EXTERNAL DISCLOSURES

The purpose of this policy is to provide accessible internal channels for reporting concerns. In most cases, we hope you will not find it necessary to report externally. However, Genus recognises that in some limited circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. If you are unsure whether external reporting is appropriate, you are encouraged to seek guidance from Compliance or to take independent legal advice.

GUIDANCE NOTES 1 – FREQUENTLY ASKED QUESTIONS

Can I report anonymously?

Yes, where permitted by local law. EthicsPoint allows you to make an anonymous report and to communicate with Compliance through a secure messaging function without revealing your identity. However, please be aware that anonymous reports can sometimes be more difficult to investigate fully, so we encourage you to provide as much detail as possible.

What if my concern involves my Line Manager?

You are not required to report to your Line Manager. You may use any of the channels available to you, including reporting directly to Compliance, your HR Business Partner, the General Counsel & Company Secretary, or via EthicsPoint.

Will I be told the outcome?

We will let you know that your report has been reviewed and, where applicable, that an investigation has been completed. However, the details or outcome of any investigation will not be shared as we are bound by confidentiality obligations, data protection requirements and legal restraints.

What if I'm worried about retaliation?

Genus prohibits any form of retaliation against anyone who Speaks Up in good faith. If you believe you have suffered detrimental treatment because of making a report, you should raise this immediately with Compliance or the General Counsel & Company Secretary. Any allegation of retaliation will be taken seriously and investigated.

GUIDANCE NOTES 2 – ETHICSPPOINT AND OTHER INTERNAL REPORTING

YOU CAN REACH ETHICS POINT IN THE FOLLOWING WAYS.

Web genusplc.ethicspoint.com

Note: EthicsPoint requires Genus to have a URL link with the organisation name in it. This does not mean that Genus will have access to your identity, if you choose to report anonymously.

QR Code

