

# MONDE NISSIN CORPORATION

## Whistleblowing Policy

### 1. PURPOSE OF THIS WHISTLEBLOWING POLICY

In line with the Monde Nissin Corporation (“MNC”) Code of Conduct and Ethics (“Code of Conduct”) and related policies, such as the Monde Nissin Corporation Anti-bribery and Corruption Policy Statement, the integrity of Monde Nissin Corporation and its subsidiaries and affiliates (“MNC Group”) is non-negotiable. We are committed to conducting our business in accordance with the law and high ethical standards.

This Whistleblowing Policy (the “Policy”) aims to:

- provide a platform for Employees, contract counterparties and other stakeholders to raise serious and sensitive concerns of suspected improper activities relating to the business of MNC or the MNC Group;
- ensure that such concerns are treated, handled and/or addressed seriously and appropriately; and
- provide assurance that any person raising a concern in good faith will be protected from reprisals or retaliation.

Any breach of this Policy will be subject to the appropriate disciplinary action (including, in serious cases, dismissal).

This Policy is not meant to supplant or supersede applicable legal provisions and principles.

### 2. SCOPE

This Policy applies to all:

- MNC Group Employees;
- MNC Group Contract Counterparties or their employees or personnel;
- MNC Group Stakeholders.

(collectively, “Covered Individuals”).

A Covered Individual should follow this Policy if he/she possesses a genuine concern about past, current or future perceived wrongdoing in connection with MNC Group’s business, and that, following such individual’s exercise of prudent and reasonable judgement, he/she decides that such perceived wrongdoing should be reported to the MNC Group accordingly.

In the spirit of integrity, transparency, and accountability, the MNC Group encourages those Covered Individuals with knowledge of perceived wrongdoing to report their concerns, under the assurance that such concerns will be taken seriously and accordingly investigated.

### 3. WHAT IS WHISTLEBLOWING?

The term whistleblowing (“**Whistleblowing**”) is used when a Covered Individual raises a concern about the existence, occurrence, commission, or perpetration of possible:

- fraud;
- bribery and/or corruption;
- acts, whether criminal in nature or not, which would tend to result in harm to other persons or to self;
- immorality and illicit behavior;
- acts that create, or tend to create, potential risk, hazard, or danger;
- breach of any laws, regulations, company policies or procedures; or
- other serious risk, wrongdoing or unlawful conduct which, in the Covered Individual’s judgment, threatens the MNC Group’s employees, third parties, or the MNC Group’s reputation

within, involving, or relating to, the Monde Nissin Group.

### 4. WHAT SHOULD I DO IF I HAVE A WHISTLEBLOWING CONCERN?

#### *Reporting through regular communication channels*

If you have a Whistleblowing concern, it is best to write it down immediately. Make a note of all relevant details, including the substance of the concern, the manner in which you became aware of the concern, the parties or persons involved, the date and time of the incident, the place or venue where such concern or incident occurred, and other witnesses, if any, to the incident or occurrence giving rise to the concern. Please keep your note factual and avoid commentary or opinion.

Keep in mind that the MNC Group welcomes the opportunity to address Whistleblowing concerns as early as possible, so it is advisable to report the concern immediately, *i.e.*, as soon as it has occurred or as soon as you have become aware of it, as far as practicable. However, do not endanger or sacrifice your personal safety for the sake of making an early report.

Employees are advised to initiate the Whistleblowing process by reporting the matter to their corresponding supervisor, if the supervisor is not the subject of, or involved in, the incident or concern giving rise to the report. The MNC Group provides training to supervisors to ensure that such concerns are dealt with confidentially and appropriately. However, we acknowledge that in certain circumstances, it may not be appropriate for a Whistleblowing concern to be raised with one’s immediate supervisors or superiors, such as when those very persons are the subject of the concern, or if an employee prefers not to raise the concern with the supervisor or superior, or the employee does not feel comfortable or confident with raising the matter with the supervisor. In these circumstances, employees could discuss the concern with one of the following:

- (a) MNC’s Chief Compliance Officer;

- (b) MNC's Chief Legal Officer;
- (c) MNC's Chief Risk Executive;
- (d) the Head of Human Resources.

The above mentioned MNC officers are responsible for dealing with Whistleblowing concerns raised by anyone in the Monde Nissin Group. They welcome your report if for any reason you do not feel comfortable raising it locally or within your reporting line.

When you report your concerns, you should arrange to hand over your notes and any evidence you may have when requested by the authorized company representative tasked with investigating the matter. If you have any personal interest in the matter, you should declare it when raising the concern.

### *Reporting through the EthicsPoint Hotline*

In the event that you do not feel comfortable reporting through the regular communication channels described above, or you feel that the concern you have raised internally has not been adequately addressed, you may report your concerns via the MNC Group's impartial and dedicated third party-managed EthicsPoint Hotline service.

The EthicsPoint Hotline service is a helpline operated by an independent and impartial third-party company called NAVEX Global. Contact details for the EthicsPoint are set out below.

Telephone: Please refer to the MNC Website for the telephone numbers used for the relevant jurisdictions

Website: <http://mondenissin.ethicspoint.com/>

When you contact the EthicsPoint Hotline to discuss suspected unacceptable conduct, the EthicsPoint Hotline service provider will make a record of all of the relevant data you will provide (whether verbally or via electronic communication). You will have the option of either identifying yourself or remaining anonymous.

The EthicsPoint Hotline service will refer the matter to MNC's Chief Compliance Officer for proper handling in accordance with regular and prescribed procedures.

Please note that if you decide to make an anonymous report via the EthicsPoint Hotline service, you will be asked to provide sufficient information to aid the service into determining how the matter should be handled. The MNC Group reserves the right to decline investigating concerns which are not supported by any evidence.

### *What Should I Not Do If I Have A Whistleblowing Concern?*

If you have a Whistleblowing concern, it is **not** advisable to:

- (a) attempt to conduct investigations by yourself for purposes of demanding restitution or damages;

- (c) discuss or disclose propriety or confidential information of the MNC Group with third parties, to ensure compliance with any confidentiality obligations under MNC Group codes, policies and handbooks as are applicable to you, save where you have a legal right or obligation to do so and the matter is properly subject to the jurisdiction of law enforcement or duly-constituted authorities and regulators.

### ***Can I make a disclosure to external bodies?***

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within the MNC Group. MNC and the MNC Group insist upon high ethical standards and compliance with the law in order to ensure a long-term, sustainable business. The officers of the MNC Group are responsible for ensuring risks are appropriately managed and receive regular training to act on Whistleblowing reports promptly. As a result, in most cases, it becomes ultimately unnecessary at the first instance to alert anyone externally.

There are laws across a number of jurisdictions that recognize that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator, law enforcement, or the MNC Group's external auditors. In some circumstances and in some jurisdictions such disclosures are protected under law, and there are conditions that you may have to comply with to retain that protection. For example, you may only receive protection under the law if you provide your name prior to the disclosure, and there are then other restrictions on who else you can inform.

If you find yourself in the unlikely position where you need to make an external 'protected' disclosure, we strongly encourage you to seek appropriate professional legal advice before doing so.

## **5. WHAT SHOULD I DO IF SOMEONE IN MY TEAM REPORTS A WHISTLEBLOWING CONCERN TO ME?**

If a member of your team or unit reports a Whistleblowing concern to you, you should do the following:

- (a) listen to the concerns of your staff and treat every report you receive seriously and sensitively;
- (b) make sure that all staff concerns are accorded due process and given a fair hearing. You should also reassure staff that they will not suffer because they have told you of their suspicions;
- (c) get as much information as possible from the reporting member of staff, including any notes and any evidence they have that may support the allegation. Do not tamper with any evidence and make sure it is kept in a safe place, if the evidence is tangible;
- (d) do not try to carry out an investigation yourself. This may damage any internal or external inquiry; and
- (e) report the matter immediately to any of the MNC Officers listed in No. 4 above.

## 6. WHAT HAPPENS ONCE I HAVE RAISED A WHISTLEBLOWING CONCERN?

If you raise a Whistleblowing concern and provide your name and contact information, the matter will be assessed for purposes of deciding the appropriate action to be taken. You will then be notified, as appropriate, of the intended timetable for any investigation. Upon its receipt of a validated concern, the MNC Group's Legal and Compliance Department will then initiate formal investigations in accordance with prescribed procedure.

Subject to applicable law and confidentiality protocols, you may receive feedback on any Whistleblowing concern you report, including the progress of the investigation. There are instances, however, that confidentiality restrictions may prevent the MNC Group from fully disclosing specific details of the investigation or any disciplinary action taken as a result. You must treat any feedback given to you about the investigation as entirely confidential.

If you are dissatisfied with the manner in which any investigating body within the MNC Group has dealt with a concern you have reported, or with the outcome of an investigation, you may contact MNC's Chief Executive Officer, Chief Legal Officer, or Chief Compliance Officer. Further investigation may be undertaken if considered appropriate by any of those officers.

*It is a very serious matter to raise a concern which you know to be false, or to bring a concern or initiate a complaint or investigation which is made in bad faith, or in a malicious and reckless manner, and/or with a view to deriving personal benefit or gain. If the investigation results in a finding that such motivations are present, disciplinary action may be taken against the person raising the concern.*

## 7. WHAT IF I HAVE BEEN INVOLVED?

Self-reporting of conduct or actions forming the basis of a Whistleblowing concern will not shield the reporting individual from being investigated, or, in appropriate cases, from being subject to appropriate disciplinary action. However, your conduct in making the report, especially if done in good faith, may be taken into account in determining what disciplinary action is appropriate.

## 8. WHAT HAPPENS IF I BECOME TARGETED, BLAMED, OR OSTRACIZED BY MY COLLEAGUES FOR HAVING RAISED A WHISTLEBLOWING CONCERN?

The MNC Group does not tolerate any form of reprisals against anyone who has raised a Whistleblowing concern in good faith. MNC Group guarantees protection to subjects of such reprisals. If you believe that you are being subjected to unfair treatment by your colleagues as a result of you having raised a Whistleblowing concern, please contact MNC's Legal and Compliance Department, or the MNC Group's Chief Compliance Officer, immediately.

## 9. PROTECTING CONFIDENTIALITY AND PRIVACY

The Monde Nissin Group will endeavour to ensure that the identities of Covered Individuals who raise or report in good faith any Whistleblowing concerns ("**Whistleblower**") are protected from disclosure. The MNC group will not disclose a Whistleblower's identity unless:

- The Whistleblower demands, or consents to, the disclosure;
- the disclosure of identity is required by law;
- the disclosure is necessary to prevent or mitigate a serious threat to a person's health or safety;  
or

- it is necessary to protect or enforce MNC’s rights or interests, or to defend any claims.

The MNC Group shall ensure that any records in connection with any Whistleblowing or investigations conducted pursuant thereto are stored securely and are accessible only by authorized officers on a need-to-know basis. Any wrongful disclosure of the foregoing information is regarded as a breach of MNC’s disciplinary policies and will be dealt with accordingly.

## **10. HOW IS MY PERSONAL INFORMATION TREATED?**

To the extent that any of the information recorded by, or provided to, the EthicsPoint Hotline service on the MNC Group’s behalf constitutes “personal information” about the Whistleblower under applicable privacy laws, it should be noted that:

- The purpose of the collection of that information is to assist the MNC Group in responding to the concern reported to it and to protect or enforce its rights or interests or to defend any claims; and
- Personal information may be used for the primary purpose for which it was collected or for any related secondary purpose that could reasonably be expected.

The MNC Group’s policy is not to collect “sensitive information” without the consent of the person to whom it relates unless the collection is required by law, is necessary to prevent or lessen a serious and imminent threat to the person’s (or another person’s) life or health, or is necessary in relation to legal proceedings (current, anticipated or potential).

“Sensitive information” includes but is not limited to information or an opinion about a person’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a profession or trade, membership of a trade union, sexual preferences or practices, criminal record or health.

## **11. DOES THE POLICY COVER HUMAN RESOURCES RELATED ISSUES?**

Nothing in this Policy is intended to supplant, remove or diminish the role of company human resources (“HR”) personnel in responding to any grievances that are covered by existing HR policies.

Concerns relating to the employment terms or matters at the local workplace such as conflicts with colleagues and managers, disciplinary sanctions, and correct and timely payment of wages and benefits, should normally be resolved locally under established HR processes.

However, this Policy recognises that there may be circumstances where certain serious and/or widespread HR-related issues move beyond individual grievances to necessitate a more coordinated response.

Therefore, if an MNC Group employee has any doubt as to the correct reporting procedure or is not comfortable raising such issues through existing HR processes, the concern may be coursed through or reported pursuant to this Policy.

## **12. POLICY REVIEW**

The Chief Compliance Officer and the Chief Risk Executive, and MNC’s Legal and Compliance Department will use the reports generated pursuant to this Policy to monitor and review regularly the

effectiveness of the programme described in this Policy. Accordingly, they will recommend from time to time the necessary amendments to this Policy to the Corporate Governance, Nomination and Remuneration Committee and/or the Board of Directors.

### **13. STATUS**

This policy is intended only as a statement of MNC policy. It does not form part of any contract of employment, or any other contract between suppliers/counterparties and any MNC Group entity. This is not, and should not be construed as, a contract and accordingly should not be given binding effect.

**Adopted by the unanimous vote of the Board of Directors on March 1, 2021.**