

GROUP WHISTLEBLOWERS POLICY

Collins Foods Limited (the Company)

1 Introduction and purpose

- 1.1 This Policy applies to the Company and all of its subsidiaries (**Collins Foods**).
- 1.2 Collins Foods is committed to the highest standards of conduct in all business activities across each of our operations and entities including promoting and supporting a culture of corporate compliance and ethical behaviour and seeking to ensure compliance with all whistleblowing legislation, including the Australian Corporations Act; (ii) the Netherlands House of Whistleblowers Act; and (iii) the European Union Whistleblower Directive.
- 1.3 The purpose of this Group Whistleblowers Policy (**Policy**) is to:
- (a) encourage Eligible Whistleblowers to raise any concerns and report instances of Reportable Conduct where there are reasonable grounds to support such conduct, without fear of intimidation, disadvantage or reprisal;
 - (b) outline the mechanisms for the reporting and investigation of reported matters;
 - (c) outline the measures in place to protect an Eligible Whistleblower; and
 - (d) outline additional procedures and protections that apply to Eligible Whistleblowers under the applicable local law in relation to the reporting of possible legislation breaches. Paragraph 3 of this Policy explains these procedures and protections.
- 1.4 It is expected that Eligible Whistleblowers will report known, suspected or potential cases of Reportable Conduct. Failure to raise issues and act could result in disciplinary action.
- 1.5 All Eligible Whistleblowers will be directed to read and review the Policy, which is made available to all Eligible Whistleblowers on the Company's website under the heading 'Corporate Governance - Key Policies'.

2 Definitions

- 2.1 Legislation / Regulatory Bodies – Australia:
- ASIC** means the Australian Securities and Investments Commission.
- Corporations Act** means *Corporations Act 2001* (Cth).
- Corporations Law** has the meaning in the Corporations Act and includes the Corporations Act and *Australian Securities and Investments Commission Act 2001* (Cth).
- 2.2 Legislation / Regulatory Bodies – Europe:
- Netherlands House of Whistleblower Act** – existing Dutch legislation that is likely to change to the Whistleblowers Protection Act in the near future.
- European Union Whistleblower Directive** - The EU adopted the Whistleblower Directive in December 2019. The EU directive is in effect, and each member state of the EU is developing their own legislation to support the directive.
- Under Netherlands law, the following authorities are the competent authorities that can be reported to externally. It will depend on the topic of the Reportable Conduct which authority is competent.
- (a) Netherlands The House for Whistleblowers Act;
 - (b) Netherlands Authority for Consumers & Markets (ACM);
 - (c) Inspectorate for Health and Youth Care (IGJ);
 - (d) Dutch Data Protection Authority (AP);
 - (e) Dutch Healthcare Authority (NZA);
 - (f) De Nederlandsche Bank N.V. (DNB);

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- (g) Dutch Authority for the Financial Markets (AFM);
- (h) Authority for Nuclear Safety and Radiation Protection (ANVS).

Eligible Whistleblower means any person who is or has been an employee, a director, secretary, officer, secondee, associate, contractor (for the supply of services or goods to Collins Foods whether paid or unpaid), shareholder, volunteers, paid or unpaid trainees of Collins Foods or an employee of such a contractor, an associate, relative or dependant of any of the foregoing who alerts Collins Foods and/or a regulatory authority to Reportable Conduct within Collins Foods.

Group means the Company and/or its subsidiaries.

Reportable Conduct means conduct or suspicion of conduct that is illegal, unacceptable or undesirable, or the concealment of such conduct or suspicion of conduct. It includes conduct or suspicion of conduct that:

- (a) is against the law or is a failure by Collins Foods to comply with any legal obligation;
- (b) is unethical or breaches Collins Foods’ policies or Group Code of Conduct;
- (c) is dishonest, fraudulent or corrupt;
- (d) is coercion, harassment, victimisation or discrimination;
- (e) is misleading or deceptive conduct of any kind (including conduct or representations which amount to improper or misleading accounting or financial reporting practices either by, or affecting, Collins Foods);
- (f) is potentially damaging to Collins Foods, an Eligible Whistleblower, third parties or the safety of other people including unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- (g) may cause financial loss to Collins Foods or damage its reputation or be otherwise detrimental to Collins Foods; or
- (h) involves any other serious impropriety or any other matters or concerns of malpractice that should be reported, including information concerning misconduct, or an improper state of affairs or circumstances in relation to Collins Foods.

In addition, the Netherland’s legislation stipulates that a person is only a protected whistleblower if the knowledge was acquired through work related activities

Whistleblower Protection Officer means a person nominated by Collins Foods whose key responsibilities include protecting Eligible Whistleblowers who report concerns under this Policy. The names and contact details of Collins Foods’ current Whistleblower Protection Officers are identified in paragraph 4 of this Policy.

3 Scope

- 3.1 This Policy applies to all Eligible Whistleblowers who wish to report Reportable Conduct regarding Collins Foods activities or activities making use of facilities or operations of Collins Foods.
- 3.2 This Policy does not deal with personal work-related grievances which are not Reportable Conduct, and for which separate procedures exist. Please refer to the Grievance Resolution Procedure which deals specifically with personal work-related grievances.
- 3.3 Examples of personal work-related grievances include:
 - (a) an interpersonal conflict between the discloser and another employee;
 - (b) a decision relating to the engagement, transfer or promotion of the discloser;
 - (c) a decision relating to the terms and conditions of engagement of the discloser;
 - (d) a decision to suspend and terminate the engagement of the discloser, or otherwise to discipline the discloser; and
 - (e) a decision that does not involve a breach of workplace laws.
- 3.4 However, a disclosure about, or including, a personal work-related grievance may in some instances still qualify for protection where there is sufficient overlap with the whistleblower regime. Examples of personal

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work-related grievances that may still constitute Reportable Conduct include instances where personal work-related grievances:

- (a) includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (i.e. 'mixed reports');
- (b) relates to conduct which intentionally causes, or threatens to cause, detriment to another person who has made a disclosure under this policy that qualifies for protection;
- (c) involves a breach by the Group, of employment or other laws that may be punishable by imprisonment for a period of 12 months or more;
- (d) involves conduct or suspicion of conduct by the Group that represents a danger to the public; and
- (e) involves you seeking legal advice or legal representation about the operation of the whistleblower protections under applicable local laws.

3.5 If it turns out that, based on your knowledge at the time of the report, you deliberately make a malicious, false or vexatious allegation under this Policy, you will not be able to access the whistleblower protections under local laws and may be subject to disciplinary proceedings. However, if you reasonably suspect misconduct or have some information leading to a suspicion (but lack all the details) we encourage you to nonetheless come forward. Provided you make your disclosure in good faith, you may still be protected even if your allegation is then found to be incorrect, unfounded or unable to be substantiated in a subsequent investigation.

4 How to make a report

4.1 Eligible Whistleblowers can report Reportable Conduct to:

- (a) a senior manager;
- (b) if the Eligible Whistleblower feels unable to raise the Reportable Conduct with a senior manager, they can raise it via a third party provider appointed by Collins Foods to provide anonymity (if required) for the person raising the issue:

AUSTRALIA

Collins Foods Ethics & Integrity

Phone: 1800 809 618 (24/7)

Email: CollinsEthicsIntegrity@accesseap.com.au

NETHERLANDS

External Confidential Hotline

Phone: 085-0221 463 (24/7)

Reporting will then be provided by the third party to the Whistleblower Protection Officers; or

- (c) directly to a Whistleblower Protection Officer.

4.2 The current Whistleblower Protection Officers nominated by Collins Foods are:

- (a) **Chief People Officer:**
Dawn Linaker
Phone: +61 7 3352 0898
Email: dlinaker@collinsfoods.com
- (b) **Chief Legal and Compliance Officer:**
Adam Thatcher
Phone: +61 7 3352 0845
Email: athatcher@collinsfoods.com
- (c) **Europe – Head of HR:**
Janita Chapman
Phone: +31 6 21 56 42 67
Email: jchapman@collinsfoods.com

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- 4.3 Before making a Reportable Conduct, you have the right to seek counsel confidentially to pre discuss your intended Report. Within Collins Foods, the Chief Legal and Compliance Officer (CLCO) is appointed as the person who you can consult in confidence. The CLCO will be further advising you on the process of reporting.
- 4.4 Reports will be kept confidential, subject to limited exceptions as detailed in paragraph 5.5 of this Policy.
- 4.5 Written reports can be made anonymously or otherwise, by sending written reports directly to a Whistleblower Protection Officer or to a dedicated email address managed by a third party engaged by Collins Foods. If an Eligible Whistleblower chooses to disclose Reportable Conduct anonymously, this may hinder the ability of Collins Foods to fully investigate the matter. Disclosures that involve a threat to life or property, illegal activities or legal action against Collins Foods may require actions that do not allow for complete anonymity. When reporting in writing, we ask you to process as limited (sensitive) personal data of others as possible.
- 4.6 Despite the above contact list, you may be able to make a disclosure to a journalist or parliamentarian that still qualifies for protection in certain discrete instances. We suggest that, before making a public interest disclosure or emergency disclosure, you contact a Whistleblower Protection Officer or an independent legal adviser to ensure you understand the criteria for making this disclosure in a way that qualifies for protection under the local whistleblowing laws.
- 4.7 Within Australia, to make a public interest disclosure you must meet all of the following criteria:
- (a) have previously made a disclosure to ASIC or APRA (or a prescribed Commonwealth authority), and at least 90 days have passed since that time;
 - (b) not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the previous disclosure related;
 - (c) have reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
 - (d) before making your public interest disclosure, give a written notification to that same body referred to in part (a) containing sufficient information to identify the previous disclosure and stating that you intend to make a public interest disclosure.

You must subsequently make your disclosure either to:

- (e) a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
- (f) a journalist (i.e. a person working in a professional capacity as a journalist for a newspaper, magazine, radio or television broadcasting service or commercial electronic service of a similar nature) (Journalist),

and must only disclose information to the extent necessary to inform the recipient of the misconduct, improper state of affairs or other circumstances the subject of the disclosure.

- 4.8 Within Australia, to make an emergency disclosure you must meet all of the following criteria:
- (a) have previously made a disclosure to ASIC or APRA (or a prescribed Commonwealth authority);
 - (b) have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
 - (c) give a written notification to that same body referred to in part (a) containing sufficient information to identify the previous disclosure and stating that you intend to make an emergency disclosure.

You must subsequently make your disclosure either to:

- (d) a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
- (e) a Journalist,

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and must only disclose information to the extent necessary to inform the recipient of the misconduct or the substantial and imminent danger.

- 4.9 For Europe, Collins Foods must appropriately inform the Eligible Whistleblower on the following procedures and channels:
- (a) The internal reporting channel that is in place;
 - (b) The external reporting channel including the Dutch House for Whistleblowers or EU authority for a person who lacks trust in internal channels or due to unavailability of internal procedures / channels;
 - (c) The public reporting channel for either:
 - (i) A person who is dissatisfied with the current internal / external follow-up on report and has waited at least three months after receiving acknowledgement of receipt or six months if the external reporting channel has extended that period of three months. In case no acknowledgement has been received the mentioned period starts running after seven days after the report has been filed; or a person who wants to report on an imminent or manifested danger to the public interest; or
 - (ii) A person who fears retaliation when reporting externally or has reasonable grounds to fear that the (suspicion of) misconduct or breach of laws will be effectively addressed due to special circumstances.

5 Handling of reports

- 5.1 All reports of Reportable Conduct will be investigated by a Whistleblower Protection Officer on a timely basis. In the case of European reports, these will be acknowledged to the Eligible Whistleblower within 7 days. Appropriate corrective action will be taken as warranted by the investigation. The Whistleblower Protection Officer is responsible for:
- (a) co-ordinating the investigation into any report received from an Eligible Whistleblower;
 - (b) documenting and handling all matters in relation to the report and investigation; and
 - (c) finalising all investigations.
- 5.2 The Whistleblower Protection Officer will, at all times, have direct and unrestricted access to reasonable financial, legal and operational assistance when this is required for any investigation.
- 5.3 A person who is the subject of an investigation is entitled to be:
- (a) informed as to the substance of any adverse comment that may be included in a report or other document arising out of any such investigation; and
 - (b) given a reasonable opportunity to put their case to the Whistleblower Protection Officer who is investigating the report.
- 5.4 The Eligible Whistleblower will be kept appropriately informed of the progress of action taken in respect of their report. At the conclusion of the investigation, they will be informed the investigation has been concluded. Feedback and follow-up are provided within 3 months.
- 5.5 Collins Foods and any persons receiving reports will not disclose particulars of reported matters that would suggest the identity of the Eligible Whistleblower. This does not apply in the event the Eligible Whistleblower has given their consent for their identity to be revealed or the disclosure is made to Australian bodies (ASIC, the Australian Prudential Regulation Authority (APRA), a legal practitioner or the Australian Federal Police) or in the case of the Netherlands – sharing of this information required by a statutory provision(s) or the requirement to share this information in performance of the tasks laid out in the House of Whistleblowers Act or the upcoming Whistleblowers Protection Act. Any such disclosure to which the whistleblower consents will be on a strictly confidential basis.
- 5.6 All files and records created from an investigation will be retained under strict security. Subject to the applicable law, the unauthorised release of information without an Eligible Whistleblower's consent to any person not involved in the investigation (other than the Audit and Risk Committee) is a breach of this Policy.

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Under Dutch law, the request to share the information and reasons will be required in written form for the Eligible Whistleblower's consent.

- 5.7 The Audit and Risk Committee will receive a summary of all investigation reports from Whistleblower Protection Officers, with full details provided upon request Anonymity and confidentiality requirements will be observed by the Audit and Risk Committee.

6 Protection of Eligible Whistleblowers

6.1 Eligible Whistleblowers that report a genuine and reasonable concern under this Policy must not be personally disadvantaged by:

- (a) dismissal;
- (b) alteration to that person's position or duties to their disadvantage;
- (c) injury to that person (physical or psychological) or their property;
- (d) damage to that person's reputation;
- (e) damage to that person's business or financial position;
- (f) any form of intimidation or victimisation;
- (g) discrimination;
- (h) current or future bias; or
- (i) any other conduct that causes detriment to the Eligible Whistleblower raising a genuine and reasonable concern under this Policy.

6.2 Under Australian law, the Eligible Whistleblower is not, however, protected from civil or criminal liability for any of its conduct which may be revealed by the report. However, if an Eligible Whistleblower reports such conduct and actively cooperates in an investigation in which they may be implicated, there may be some cases where the fact they have made a report will be taken into account as a mitigating factor when determining actions which may be taken against them.

7 Protection under the Australian Corporations Legislation

7.1 The Corporations Act provides additional protections in relation to the reporting of a possible contravention of the Corporations Act, and certain other pieces of Commonwealth legislation. A disclosure of information by a person qualifies for protection under the Corporations Act if:

- (a) the person is an Eligible Whistleblower;
- (b) the report is made to:
 - (i) ASIC;
 - (ii) Collins Foods' auditor, or a member of the audit team;
 - (iii) a Board Director, secretary or senior manager of Collins Foods;
 - (iv) where the Eligible Whistleblower is an employee of a Group company, a senior manager of that employee;
 - (v) an actuary of Collins Foods; or
 - (vi) a legal practitioner for the purposes of seeking legal advice as to whether and what protections may apply to the Eligible Whistleblower; and
 - (vii) a person authorised by Collins Foods to receive disclosures of that kind (that is, a Whistleblower Protection Officer); and

the Eligible Whistleblower has reasonable grounds to suspect that the information indicates that there has been conduct that:

- (viii) concerns misconduct, or an improper state of affairs;

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- (ix) constitutes an offence against, or a contravention of, the Corporations Legislation, the *Banking Act 1959* (Cth), the *Financial Services (Collection of Data) Act 2001* (Cth), the *Insurance Act 1973* (Cth), the *Life Insurance Act 1995* (Cth), the *National Consumer Credit Protection Act 2009* (Cth) or the *Superannuation Industry (Supervision) Act 1993* (Cth), or regulations made under those laws;
- (x) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- (xi) represents a danger to the public or the financial system, by a Group company or any of its officers or employees.

7.2 If these conditions are met, the Corporations Act provides the following protections to the Eligible Whistleblower:

- (a) the Eligible Whistleblower is not subject to any civil or criminal liability for making the disclosure. The Eligible Whistleblower is not, however, protected from civil or criminal liability for any of its conduct which may be revealed by the report;
- (b) no contractual or other remedy may be enforced or exercised against an Eligible Whistleblower on the basis of the disclosure, and a contract to which the Eligible Whistleblower is a party may not be terminated on the basis that the disclosure constitutes a breach of the contract;
- (c) if Collins Foods purports to terminate the employment of an Eligible Whistleblower on the basis of the disclosure, a court may reinstate the Eligible Whistleblower to the same position or a position at a comparable level;
- (d) the Eligible Whistleblower is protected from actual or threatened detriment because of the report and may receive compensation for any damage caused by such detriment. A court may order that a number of additional remedies be provided to the Eligible Whistleblower in certain circumstances;
- (e) subject to limited exceptions, the person to whom the disclosure is made must not disclose the substance of the report, the Eligible Whistleblower's identity or information likely to lead to identification of the Eligible Whistleblower.

7.3 Collins Foods is committed to full compliance with these protective provisions.

8 Review and amendment of this Policy

- 8.1 This Policy can only be amended with the approval of the Board.
- 8.2 The Board shall review and reassess this Policy annually or otherwise as it considers necessary.

9 Processing of personal data

- 9.1 Collins Foods is processing personal data of employees when applying the present policy. We refer to the privacy notice applicable to the present policy, which has been added to this policy as **Annexure B**.

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Annexure A: Additional protection relating to Australian tax matters

OVERVIEW OF ELIGIBILITY

The Tax Act gives you special protection for disclosures about a breach of any Australian tax law by Collins Foods or misconduct in relation to Collins Foods' tax affairs where all of the following conditions are satisfied:

- (a) you are an Eligible Whistleblower;
- (b) you report the matter to a Whistleblower Protection Officer, a director, secretary or senior manager of Collins Foods, any Group external auditor (or member of that audit team), a registered tax agent or BAS agent who provides tax or BAS services to Collins Foods, or any other team member or officer of Collins Foods who has functions or duties relating to the tax affairs of Collins Foods (e.g. an internal accountant) (each, a **Company Recipient**), the Commissioner of Taxation (**Commissioner**), or a lawyer for the purpose of obtaining legal advice or representation in relation to a disclosure; and
- (c) if the disclosure is made to:
 - (i) a Company Recipient, you:
 - A have reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Collins Foods or an associate of that Company; and
 - B consider that the information may assist the Company Recipient to perform functions or duties in relation to the tax affairs of Collins Foods or an associate of Collins Foods; or
 - (ii) the Commissioner, you consider that the information may assist the Commissioner to perform functions or duties in relation to the tax affairs of Collins Foods or an associate of Collins Foods.

The protections given by the Tax Act when the above conditions are met are as follows:

- (d) protection from civil, criminal and administrative legal action relating to your disclosure;
- (e) protection from detriment (or threat of detriment) engaged in on the belief or suspicion that you have made, may have made, propose to make or could make a disclosure, and certain rights to compensation for damages caused by such detriment;
- (f) protection of your identity, unless you consent to the disclosure or where:
 - (i) the disclosure is only to the extent reasonably necessary for the effective investigation of the allegations raised in your disclosure;
 - (ii) the concern is reported to the Commissioner or the Australian Federal Police; or
 - (iii) the concern is raised with a lawyer for the purpose of obtaining legal advice or representation;
- (g) where the disclosure was made to the Commissioner, non-admissibility of the reported information in criminal proceedings or in proceedings for the imposition of a penalty (except where the proceeding relates to the veracity of the information); and
- (h) unless you have acted unreasonably, protection from any adverse costs-order in legal proceedings relating to the disclosure.

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Annexure B: Whistleblowing Privacy Notice

Last Updated: July 2022

1. INTRODUCTION AND SCOPE

Collins Foods Limited, together with its subsidiaries and affiliated companies (collectively referred to as **Collins Foods**), is committed to the highest standards of conduct in all business activities across each of its operations and entities including promoting and supporting a culture of corporate compliance and ethical behaviour and seeking to ensure compliance with all whistleblowing legislation. More information on Collins Foods’s aims, procedures and measures in relation to whistleblowing can be found in the [Collins Foods Group Whistleblowers Policy](#).

Collins Foods encourages to raise any concerns and report instances of conduct in keeping with the Group Whistleblowers Policy, provided it involves conduct or suspicion of conduct that:

- (a) is against the law or is a failure by Collins Foods to comply with any legal obligation;
- (b) is unethical or breaches Collins Foods’ policies or Group Code of Conduct;
- (c) is dishonest, fraudulent or corrupt;
- (d) is coercion, harassment, victimisation or discrimination;
- (e) is misleading or deceptive conduct of any kind (including conduct or representations which amount to improper or misleading accounting or financial reporting practices either by, or affecting, Collins Foods);
- (f) is potentially damaging to Collins Foods, a whistleblowing reporter (eligible whistleblower), third parties or the safety of people, including unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- (g) may cause financial loss to Collins Foods or damage its reputation or be otherwise detrimental to Collins Foods; or
- (h) involves any other serious impropriety or any other matters or concerns of malpractice that should be reported, including information concerning misconduct, or an improper state of affairs or circumstances in relation to Collins Foods (**Reportable Conduct**).

The report may be submitted by any person who is or has been an employee, a director, secretary, officer, secondee, associate, contractor (for the supply of services or goods to Collins Foods whether paid or unpaid), shareholder, volunteers, paid or unpaid trainees of Collins Foods or an employee of such a contractor, an associate, relative or dependent of any of the foregoing (**Eligible Whistleblower**).

Reports of Reportable Conduct – which can be submitted by email, or phone – will typically contain (special categories of) personal data of involved individuals, such as the Eligible Whistleblower and/or an investigated individual, to which the conditions of the General Data Protection Regulation (EU 2016/679) (**GDPR**) apply, as well as potentially other (local) data protection legislation. This Privacy Notice (**Notice**) serves to duly inform all involved individuals about the manner in which Collins Foods processes and protects their personal data in relation to its whistleblowing reporting obligations.

When this Notice mentions “Collins Foods”, “we”, “us”, or “our”, Collins Foods is in principle referring to the Collins Foods entity the Reportable Conduct relates to, as this entity is generally responsible for the investigation and handling of the report. The responsible Collins Foods entity can however decide at its own discretion to involve another (local) Collins Foods entity in so far such is necessary for handling the report. As a result, the other involved (local) Collins Foods entity may also – to a certain extent – gain access to and control over the personal data involved.

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2. CONTACT INFORMATION

If you have any questions regarding the processing of your personal data in relation to a reported Reportable Conduct, you can use the below contact details of the country in which the responsible Collins Foods entity is established:

Australia Privacy Officer Collins Foods Limited PO Box 286 Lutwyche QLD 4030 Email: privacyofficer@collinsfoods.com	United Kingdom The Directors Collins Foods Europe Limited c/- Peregrine Law Limited WeWork 10 York Road, London SE1 7ND Email: nclark@collinsfoods.eu
Germany Data Protection Officer Wanheimer Straße 45 40472 Düsseldorf Email: info@collinsfoods.de	The Netherlands Data Protection Officer Schurenbergweg 9b 1105 AP Amsterdam Email: infocfn@collinsfoods.eu

3. DOES THIS NOTICE APPLY TO YOU?

This Notice applies to you if you are an Eligible Whistleblower or are a person that is subject of an investigation (**Investigated Individual**), a witness or an individual who may know about the Reportable Conduct (**Witnesses**) and/or an otherwise involved third party and your personal data is processed in the context of a reported Reportable Conduct by Collins Foods.

4. WHAT PERSONAL DATA DOES COLLINS FOODS COLLECT AND FOR WHAT PURPOSE?

Collins Foods will need to process personal data in the course of handling Reportable Conducts and to comply with (local) statutory whistleblowing obligations (where applicable). Although the content of each whistleblowing report will most likely be different, typically, the following information may be provided by an Eligible Whistleblower when a report is submitted and therefore processed by Collins Foods:

- **Eligible Whistleblower** - This may include your first and last name, phone number, e-mail address and Collins Foods employment ID. Also information about the Reportable Conduct, such as the description of the general nature of the Reportable Conduct, the moment when and where the Reportable Conduct occurred, the duration of the Reportable Conduct and supporting documentation can contain your personal data.
- **Investigated Individual** - Your contact details and personal details, such as first and last name, as well as your function and contact details may be processed. Furthermore, information about the Reportable Conduct, such as the description of the general nature of the Reportable Conduct, the moment when and where the Reportable Conduct occurred, the duration of the Reportable Conduct and supporting documentation can contain personal data of the Investigated Individual.
- **Witness** - This may include your first and last name, as well as your function and contact details. Possibly additional personal data will be processed due to information provided in the report in order to describe the Reportable Conduct and supporting documentation.
- **Third parties** - Identifying information, such as your first and last name, as well as your function and contact details.

In the process of handling reported Reportable Conduct it can – in addition to the personal data provided in the report – be necessary for Collins Foods to process other information, such as the Investigated Individual’s response to the Reportable Conduct or the statement of a Witness, in order to adequately handle the report.

5. WHAT LEGAL GROUNDS APPLY TO COLLINS FOODS TO PROCESS YOUR PERSONAL DATA?

Personal data shall only be collected, used, stored or otherwise processed if this is necessary for Collins Foods to duly handle reported Reportable Conducts. We process your personal data based on one of the following legal grounds:

- **The processing is necessary for us to comply with our legal obligations pursuant to applicable whistleblowing laws and regulations:** Collins Foods is obliged to process personal data in relation to reported Reportable Conducts in order to comply with applicable statutory obligations in relation to whistleblowing schemes. For example, in the Netherlands the House of Whistleblowers Act (*Wet Huis voor klokkenluiders*) is applicable – derived from the

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European Whistleblowing Directive (EU 2019/1937) – obliging the Dutch entities of Collins Foods to implement a whistleblowing procedure and consequently process personal data in this context.

- **The processing is necessary for the legitimate interests of Collins Foods:** Collins Foods may be required to process personal data in relation to reported Reportable Conducts if such is necessary for the purposes of legitimate interests pursued by Collins Foods or a third party, provided these interests override the interests of the individuals whose personal data are processed. Such may be the case in jurisdictions where Collins Foods affiliates are established and no (sufficient) laws and regulations are in place to govern whistleblowing.

Collins Foods will only process your personal data for the purpose of handling the reported Reportable Conduct. Appropriate measures will be taken to ensure that your personal data can be (permanently) erased or rectified when considered inaccurate or incomplete by Collins Foods.

6. DOES COLLINS FOODS PROCESS SPECIAL CATEGORIES OF PERSONAL DATA OR PERSONAL DATA RELATING TO CRIMINAL CONVICTIONS AND OFFENCES?

Collins Foods can process special categories of your personal data, meaning personal data concerning your religious or philosophical beliefs, race or ethnic origin, political opinions, health and sexual life, biometric data in order to uniquely identify a person and trade union membership. This also applies to personal data related to criminal convictions and offences or related security measures (hereinafter collectively referred to as **Special Personal Data**). For instance, if Special Personal Data is provided in a report or the processing of Special Personal Data is necessary for adequately investigating and handling a reported Reportable Conduct.

As a rule, Collins Foods will only process Special Personal Data in so far as such is permitted by applicable (privacy and data protection) legislation, such as the GDPR, EU Whistleblowing Directive and local data protection laws. For instance, Special Personal Data will be processed if such is necessary for purposes of carrying out obligations and exercising specific rights in the field of employment (Article 9(1)(b) GDPR), reasons of substantial public interest (Article 9(2)(g) GDPR), to protect ourselves and/or our staff against (expected) criminal offences and/or to protect our legitimate business operation and interests (Article 10 and Article 33(2)(b) Dutch GDPR Implementation Act).

Special Personal Data not considered necessary for handling a reported Reportable Conduct, will be permanently deleted by Collins Foods as soon as possible.

7. WHO HAS ACCESS TO YOUR PERSONAL DATA?

Collins Foods shares your personal data internally and with third parties in the following circumstances:

- With its affiliates if such is necessary for adequately investigating and handling reported Reportable Conducts. For instance, if the reported Reportable Conduct relates to multiple Collins Foods entities, it may be necessary to share (parts of) your relevant personal data with these other involved Collins Foods entities to adequately investigate and handle the report.
- With processors, i.e., third parties processing personal data on our behalf. Our processors are only allowed to process your personal data in accordance with our instructions and are bound by a strict obligation of confidentiality.
- With a select number of our employees who – according to their function – are equipped and permitted to handle reports and lead the whistleblowing investigation.
- When required to do so by law, court order, or other legal process, for example, with law enforcement agencies or other governmental agencies, to establish or exercise our legal rights.

8. HOW LONG WILL COLLINS FOODS RETAIN YOUR PERSONAL DATA?

We will retain your personal data no longer than necessary for the purpose of investigating and handling reported Reportable Conducts. Longer retention periods will be applied when legal proceedings or disciplinary measures are initiated against the Investigated Individual, or the Eligible Whistleblower in cases of false statements, or vice versa: when the Investigated Individual or Eligible Whistleblower file a legal claim against us. In such cases, personal data will in any case be kept until the conclusion of these proceedings and the period allowed for any appeal, in accordance with (local) law. We may also be required to store your personal data for a longer period if such follows from applicable law (e.g., in relation to criminal activities).

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Personal data considered irrelevant for handling the reported Reportable Conducts will not be further processed by Collins Foods and will be:

- deleted as soon as possible, or
- referred to the right channel within Collins Foods if it for example concerns other categories of conduct that does not fall within the scope of the Group Whistleblowers Policy and this Notice.

9. WHAT MEASURES DOES COLLINS FOODS TAKE TO PROTECT YOUR PERSONAL DATA?

Collins Foods has taken appropriate technical and organisational measures to protect your personal data against destruction, loss, alteration, unauthorised disclosure or unauthorised access, including by ensuring that:

- the confidentiality of your personal data is guaranteed and the integrity and availability of your personal data will be maintained;
- our relevant personnel are trained in information security requirements; and
- your personal data is protected against unauthorized access.

10. WHERE DOES COLLINS FOODS STORE OR TRANSFER YOUR PERSONAL DATA TO?

As Collins Foods has a global presence, Collins Foods may – if such is necessary according to paragraph 1 and 7 of this Notice – transfer your personal data to locations outside the country where you reside in order to investigate and handle a reported Reportable Conduct. In any case where we transfer personal data outside the European Economic Area (EEA), we shall ensure that such a transfer is subject to appropriate safeguards.

Transfers of personal data originating from EEA to Collins Foods affiliates outside the EEA are governed by the Collins Foods Data Transfer Agreement, based on the model contractual clauses for data transfers approved by the European Commission.

Transfers to third parties (outside the EEA) will be governed by a contract based on the model contractual clauses for data transfers approved by the European Commission or other appropriate safeguards as laid down in article 46 of the GDPR.

11. WHAT RIGHTS CAN YOU EXERCISE IN RELATION TO YOUR PERSONAL DATA?

Based on the law applicable to the use of your personal data, you have rights in relation to your personal data. Note that when considering a request in relation to these rights, your role in the reported Reportable Conduct and the current stage of the investigation are relevant. We carry out a case-by-case assessment of each individual case to determine whether a request should be complied with or any exceptions pursuant to the GDPR are applicable. For instance, we are not allowed to comply with your request if – according to the applicable (local) law – the rights and freedoms of others need to be protected, criminal offences need to be prevented, investigated, detected or prosecuted or if civil law claims are enforced.

The rights you potentially have in relation to the personal data we collect about you in the context of the handling reported Reportable Conducts are:

Right of information	You have the right to obtain certain information about the manner in which we process your personal data. This information is made available to you by means of this Notice.
Right of access	You are entitled to request a copy of the personal data we hold about you and to learn details about how we use it. Your personal data will usually be provided to you digitally. We may require you to prove your identity before providing the requested information.
Right to rectification	We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you believe this is not the case, you have the right to request that any incomplete or inaccurate personal data that we process about you is amended.
Right to erasure	You have the right to ask us to erase your personal data, for example where the personal data is no longer necessary for the original purpose for which they were collected or where personal data has become obsolete. However, this will need to be balanced against other factors. For example, we may not be able to comply with your request due to certain legal or regulatory obligations.

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Right to restriction of processing	You are entitled to ask us to (temporarily) stop using your personal data, for example where you think that the personal data we hold about you may be inaccurate or where you think that we no longer need to use your personal data.
Right to object	You have the right to object to the processing of your personal data, which is based on our legitimate interests. We will no longer process the personal data on that basis when you file an objection, unless we have a compelling legitimate ground for the processing.

12. WHAT IF YOU HAVE OTHER QUESTIONS OR COMPLAINTS?

Questions or complaints regarding the processing of your personal data can be directed to Collins Foods by using the contact information as provided in paragraph 2 of this Notice.

You also have the right to lodge a complaint with the competent (local) data protection authority in the jurisdiction where you work, where you live or where an alleged infringement takes place. A listing of the European Data Protection Authorities can be found [here](#).

13. WILL THERE BE UPDATES TO THIS NOTICE?

Collins Foods may update this Notice from time to time. If an amendment has a serious privacy impact, Collins Foods will endeavour to actively inform you about such amendments.

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