



ELEMIS

Speak Up Policy

Speaking up - and being heard

DOCUMENT RECORD

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This Speak Up Policy (this “Policy”) applies to all ELEMIS employees, anyone carrying out work or services for or on behalf of ELEMIS and any person or organisation connected with ELEMIS.

Speaking up is one of the most important ways we protect our people, our culture and our business. If something doesn’t feel right, we want to hear about it.

At ELEMIS, we are committed to creating an environment where people feel confident raising concerns. Speaking up allows us to address issues early, learn from them, and take the right action.

You don’t need to have proof before raising a concern. If you have a reasonable belief that something may be wrong, we would always rather you speak up so it can be properly understood and addressed.

This policy explains when and how to raise a concern, what you can expect from us when you do, and how we will support and protect those who speak up in good faith.

OUR COMMITMENT

Speaking up should feel safe. When you raise a concern, you can expect to be taken seriously, treated fairly and respectfully, and protected from retaliation.

- We will handle concerns confidentially and sensitively.
- We will protect anyone who raises a concern in good faith.
- We will not tolerate retaliation against a person who speaks up or supports an investigation.
- We will investigate concerns fairly, independently and without bias.

WHO THIS POLICY APPLIES TO

This policy applies to ELEMIS employees and officers. We also encourage others connected with ELEMIS to use it where appropriate, including contractors, agency workers, consultants, suppliers and partners.

Everyone has a role to play in protecting our culture, our people and our standards of conduct.

WHEN YOU SHOULD SPEAK UP

You should speak up if you have a genuine concern about wrongdoing, misconduct, unethical behaviour, or a breach of law, regulation, policy or our expected standards.



Examples of concerns you can raise	When this policy is not the right route
• Fraud, theft or financial misconduct • Bribery or corruption • Discrimination, harassment or bullying • Human rights concerns • Health, safety or environmental risks • Conflicts of interest • Retaliation against someone for speaking up • Concealment of any of the above	• Personal employment concerns or contractual issues, which should usually be raised through the grievance process • Routine HR questions or day-to-day workplace issues • Customer service complaints or order issues • Immediate threats to life or property, where emergency services should be contacted • Allegations you know to be false

OUR PRINCIPLES

This policy is built on four simple principles:

1. Speak up in good faith

Concerns should be raised honestly and with the intention of bringing a potential issue to light. This does not mean you need to be right, but it does mean you should not knowingly make a false or malicious allegation.

2. Protection and fairness

We protect people who raise concerns in good faith. We also treat everyone involved fairly, including anyone named in a concern. No conclusions will be reached until the facts have been reviewed.

3. Confidentiality

We will protect identities and sensitive information wherever possible. Information will only be shared with those who need it in order to assess, investigate or respond to the concern.

4. Accountability

Concerns will be reviewed appropriately and action will be taken where needed, in line with our policies and the law.

HOW TO SPEAK UP

You can speak up in the way that feels most comfortable and appropriate to you. There is no single right route. What matters is that you raise the concern so it can be understood and addressed.

START WITH WHAT FEELS RIGHT

Depending on the situation, you may feel comfortable raising your concern:

- Directly with the person involved, where this feels safe and appropriate
- With your line manager
- With a trusted colleague
- With the People Team, Compliance or another appropriate function

In some cases, concerns can be resolved quickly and informally through open conversation. However, if this does not feel right, or if the concern is more serious or sensitive, you have other options.

OTHER WAYS TO SPEAK UP

- Speak to another manager or senior leader
- Speak to the People Team
- Use the Speak Up channel, which is a confidential reporting route

IF YOUR CONCERN INVOLVES YOUR MANAGER

You will never be expected to raise a concern with someone you believe may be involved. If your concern relates to your line manager, or you do not feel comfortable raising it with them, you can go directly to another senior leader, the People Team, Compliance or the Speak Up channel.

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ESCALATING A CONCERN

If you believe your concern has not been handled appropriately, you can raise it again through another internal route or escalate it to a more senior level. In certain circumstances, you may also choose to report concerns externally to a relevant authority.

HOW TO USE THE SPEAK UP CHANNEL

If you would prefer to raise a concern confidentially, or the issue is sensitive, you can use the L'OCCITANE Group Speak Up channel. The channel is designed to make speaking up safe, simple and accessible.

ACCESSING THE CHANNEL

The Speak Up channel can be accessed in a way that works best for you:

ACCESSING THE CHANNEL

You can submit a report through the online platform: [L'OCCITANE Group Speak Up channel](#)

- You'll be asked to create a password and will receive a case reference number
- This allows you to track progress, receive updates and communicate with the investigation team
- You can do this even if you choose to remain anonymous
- You can opt to receive notifications by providing an email address (handled confidentially by the independent provider), or log back in using your password and case number

Please keep your login details safe, as you'll need them to follow up on your report.

MOBILE APP

You can also access the Speak Up channel via the mobile app:

- Use the organisation code 116979 (or a QR code where available)
- Create a password and receive a case reference number
- Your report account allows you to track progress, receive notifications and communicate with the investigation team
- Anonymous reporting is supported

TELEPHONE REPORTING

You can raise a concern by leaving a phone message (local numbers are listed in the annex):

- Access the channel using the organisation code 116979
- Create a PIN and record your concern in your local language

- You'll receive a case reference number at the start of the call
- You can use this to check progress by calling back

The channel is operated by an independent third party and is available 24 hours a day, 7 days a week. It supports anonymous reporting and is available in more than 70 global languages.

WHAT INFORMATION TO INCLUDE

Please provide as much factual and relevant detail as you reasonably can. Useful information may include:

- What happened and why it concerns you
- The background or history of the concern
- The names or roles of people involved, if known
- Relevant dates, locations and context
- Any documents or information that may support the concern

You do not need to investigate the matter yourself. Please do not try to gather evidence in a way that could put you or anyone else at risk.

ANONYMOUS REPORTING

Reports can be made anonymously through the Speak Up channel where allowed by local law. If you choose to identify yourself, we will take appropriate steps to keep your identity confidential and will only share it on a need-to-know basis, or where required by law.

WHO VIEWS REPORTING

Reports submitted through the Speak Up channel are logged securely in a case management system. They are reviewed by appropriately authorised teams and, where required, other internal or external specialists may be involved, such as People, Legal or Procurement. Information is shared only where needed to assess or investigate the concern.

WHAT HAPPENS WHEN YOU RAISE A CONCERN

We know raising a concern can feel difficult. We will handle the process carefully and keep you informed where we can.

1. Acknowledgement

You will receive confirmation that your concern has been received. For reports submitted through the Speak Up channel, confirmation is provided within seven working days.

2. Assessment and triage

The concern will be assessed to confirm whether it falls within the scope of this policy and whether there is enough information to review or investigate it. It may then be triaged depending on the nature of the issue and the expertise required.

If a concern is determined not to fall within the scope of this Policy, the person who raised the concern will, where possible and appropriate, be informed of that decision and provided with an explanation. Where another process is more appropriate — such as an employee grievance procedure, customer complaint process, supplier escalation route or another internal policy — guidance will be provided on the appropriate next steps.

3. Investigation

Where an investigation is needed, it will be carried out with an appropriate level of time, attention and resources. Investigations will be fair, independent and unbiased, and will respect all parties involved.

4. Outcome

If a concern is substantiated, appropriate action will be taken in line with our policies and the law. Where possible and appropriate, the person who raised the concern will be informed of progress and overall findings.

Timelines for each stage will be clearly communicated. All parties will be kept up to date via their case manager, providing outcomes and feedback throughout and at the end of the process through closure and resolution.

INDEPENDENCE AND CONFLICT OF INTEREST

ELEMIS will ensure that concerns are assessed, investigated and resolved objectively and fairly.

Any individual who is the subject of a concern, who may be directly involved in the matter, or who has an actual or perceived conflict of interest, will not participate in decisions relating to the assessment, investigation, findings or resolution of the concern.

Where a conflict of interest is identified, alternative decision-makers, investigators or reviewers will be appointed to support independence, impartiality and fairness throughout.

HOW STAKEHOLDERS ARE INFORMED OF THE PROCEDURE

Internal stakeholders are notified via the company Handbook and in employee inductions. Suppliers are notified via ELEMIS' Supplier Onboarding process. All stakeholders can find ELEMIS' Speak Up policy and notification channel on [ELEMIS.com](https://www.elemis.com).

PROTECTION FROM RETALIATION

No one should suffer for raising a concern in good faith. You will not be dismissed, penalised, victimised or treated unfairly because you have spoken up or supported an investigation.

Retaliation may include actions that cause financial, professional or emotional harm because someone has raised or supported a Speak Up report. Retaliation will be treated seriously and may result in disciplinary action.

False or malicious reports

Knowingly making a false or malicious allegation is also serious and may result in disciplinary action.

DATA PROTECTION AND CONFIDENTIALITY

When a concern is raised, ELEMIS and L'OCCITANE Group will process any personal data collected in line with applicable data protection requirements and our data protection standards. Information will be held securely and accessed or disclosed only for the purpose of dealing with the concern.

This Policy has been reviewed and formally endorsed by the ELEMIS General Management Committee (GMC) and reflects our commitment to creating an environment and adequate processes, for people to confidently raise concerns.