

## Speak Up Policy

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**VERSION:** 2.0

**EFFECTIVE DATE:** 31 May 2021

**OWNER:** General Counsel & Company Secretary

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THIS POLICY IS NOT TO BE AMENDED OR VARIED WITHOUT THE WRITTEN CONSENT OF THE POLICY REVIEW PANEL AND THE GENERAL COUNSEL & COMPANY SECRETARY.

### 1. Policy Statement

We are committed to conducting our business honestly and with integrity. We care for each other, our consumers, Restaurant Partners and suppliers, and society and our environment, and a big part of that is making sure our people feel encouraged and supported to speak up without fear of retaliation when something isn't right.

### 2. Scope

In this Policy, the words "JET", "we", "our", and "us" refer to Just Eat Takeaway.com N.V. and all its subsidiaries and affiliates across the world.

Whether you're an employee, an independent contractor, a supplier, a Restaurant Partner, a shareholder, a customer, or a relative of any of the above, you can use this Policy to speak up.

### 3. What do we mean by "speaking up"?

You'll be "speaking up" if you pass information on to us that you reasonably believe indicates:

- Bribery, fraud, or other criminal activity
- Modern slavery
- High risk attitudes to someone's health and safety
- A breach of our Code of Conduct
- Sexual harassment
- Risk or actual damage to the environment
- A miscarriage of justice
- A company in the Just Eat Takeaway.com Group breaking the law
- Unethical or dishonest conduct
- A violation of any of our policies, procedures or protocols
- Someone covering up wrongdoing

If you're an employee facing an issue that would normally be dealt with by our HR team, however, please follow our [HR Policies](#) instead.

If you're not sure whether a concern is an HR team matter or is in the public interest (this means it must affect others, for example the general public), please speak to the HR team or your line manager.

#### 4. How can you speak up?

If you work at JET, speak to your line manager or someone in the HR team in the first instance. If you don't feel comfortable doing that, we also have a Speak Up Hotline, a service operated by Convercent (an external and independent organisation). You can call them using the numbers listed below 24/7, 365 days a year.

If you're in...	...call...
Australia	1 800 763 983
Austria	0800 281119
Belgium	0800 260 39
Bulgaria	0800 46038
Canada	1-800-235-6302
Denmark	8082 0058
France	0805 080339
Germany	0800 181 2396
Ireland	1800 904 177
Israel	1 809 477254
Israel (Jerusalem)	2-375-2169
Italy	800 727 406
Luxembourg	800-27-311
Netherlands	0-800-022-0441
New Zealand	0800-002-341
Norway	800 24 664
Poland	00-800-141-0213
Portugal	800 180 367
Romania	0-800-360-228
Spain	900 905460
Switzerland	0800 838 835
United Kingdom	0 808 189 1053

Please note that the hotline is not an emergency service. If your safety, or the safety of someone you know, is in danger, contact your local emergency services.

You can also raise your concern [online](#). You can find links to our Speak Up website, which is also operated by Convercent, on the Kitchen or any of the platform websites for the countries listed above.

Convercent supports over 340 languages, so you can submit your report online or by telephone in whichever language you prefer.

Please raise your concern as soon as possible - don't hold off because you feel you need to gather evidence. If you have a reasonable suspicion that something's up, speak up!

If you make a report via Convercent, you can choose to give your name or remain anonymous. Unfortunately, if you're based in Portugal, we are not able to support anonymous reporting as it's not permitted under national law.

While we understand there might be situations where you feel you have no choice but to remain anonymous, anonymous reports are harder for us to investigate. Please be reassured that we will not tolerate retaliation of any kind against you where you have raised a concern to us.

## **5. What happens next?**

After you have raised your concern, the issue will be passed onto the people listed in paragraph 5.1 below so that the matter may be fully investigated.

The purpose of the investigation is to gather evidence and facts about the issue raised. You'll be informed of the progress of the investigation within seven days of raising your concern. If your report was made anonymously via Convercent, you'll need to call them on one of the numbers above or check the Speak Up website to receive progress updates.

When an investigation has concluded, a decision will be taken about the actions we might need to take. If we have found evidence of wrongdoing, consequences might include dismissal, passing details onto law enforcement, or changes to our policies and procedures to prevent similar issues from arising again in the future.

### **5.1. Who will investigate the issue?**

- The Group HR Director looks after HR-related matters, such as discrimination or harassment.
- The Director Compliance looks after all other matters, except where the matter has gone to the General Counsel & Company Secretary.

If you want to flag something about a member of the Management Board or Supervisory Board, your report will go to the General Counsel & Company Secretary.

If you are based in Italy, your report will also be reviewed by the Italian supervisory body.

The Group HR Director, Director Compliance or the General Counsel & Company Secretary may delegate the investigation to other people, but will stay ultimately responsible for the investigation.

## **6. We investigated, but you're not happy. What can you do about it?**

If you aren't satisfied with the investigation or the actions taken, please contact the Chair of the Audit Committee through the Vice President Group Internal Audit.

## **7. Things to remember**

### **7.1. You need to...**

- Make sure you have a reasonable suspicion that something, which is in the public interest or related to the integrity of our business, is not right
- Raise your concern in good faith

## 7.2. ...and in return, we promise to...

- Take your concern seriously
- Carry out a proportionate and fair investigation
- Treat both you and the people we speak to equally
- Update you within seven days of you raising your concern
- Keep your details and the investigation strictly confidential as much as possible<sup>1</sup>

## 8. If you've found something you believe is really serious, but you're not comfortable speaking up within JET or using Convercent, what can you do?

We want to reassure you that speaking up internally is strongly encouraged, and this should always be your first step. In special circumstances you can go to a regulator, or if you've exhausted all internal procedures you might even want to report your concern externally. You are under no obligation to speak up internally first if you report something to a regulator, and you do not need to tell us if you have spoken up externally.

We strongly recommend you seek independent and impartial advice from a trusted organisation or body before speaking up outside of JET. That way you can get the support you need to make an informed decision.

## 9. Where to go for advice

There are a few places you can go if you're not sure about whether to flag something or who to go to. If you want to talk to someone at JET, try your line manager, a member of the HR team, or the Compliance team.

There's also an independent body called [Protect](#), which was set up just to help people who are thinking about speaking up. You can speak to them for free using their Advice Line, which is totally confidential.

## 10. Retaliation and Malicious Allegations

We will not tolerate retaliation in any form against people who have raised a concern. Victimisation or harassment of those who speak up, or malicious allegations, may result in disciplinary proceedings, up to and including dismissal.

However, there may be serious consequences if you deliberately make a false report. If it becomes clear you deliberately made a false report this may result in disciplinary proceedings, up to and including dismissal.

If you decide to speak up, you will not only be protected by JET, but you will also have specific protections given to you by law in your own country.

If you have been victimised, harassed, or feel you've suffered another form of retaliation as a result of speaking up, you should make a complaint, following our Grievance Policy if you work for JET or, (if you don't work for JET), you should contact the Director Compliance or the Group HR Director at [compliance.global@justeattakeaway.com](mailto:compliance.global@justeattakeaway.com).

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<sup>1</sup> Our investigation may mean we need to pass details onto the HR team or someone in a department we work with during an investigation. If the matter relates to criminal or illegal activity, we may be required to disclose the report and the evidence we have found to law enforcement. When we do have to disclose something, this will be on a need-to-know basis, limited to the directly relevant facts and in compliance with all relevant data protection laws.

## 11. What would “speaking up” mean for your personal data?

If you become involved in an internal investigation, whether you’ve spoken up or someone else has, we may need to process your personal data. Your personal data will be processed solely for the purpose of completing the investigation process and in order to comply with our legal obligations.

We will do everything we can to protect you from retaliation in any form where you have raised a concern to us in good faith.

## 12. Monitoring and Review

This policy is monitored by the Legal team and the Policy Review Panel. This policy will be reviewed at least annually.

Version	Amended by...	Date	Approved by Policy Review Panel	Approved by ExCo Member
2.0	Alice Drain	11/02/2021	Amabel Evans	Sophie Versteege