

DIAGEO



How
SpeakUp
Works

GLOBAL STANDARD
UPDATED SEPTEMBER 2023

What is SpeakUp?

SpeakUp is a confidential service for you (the reporter) to raise concerns about our business conduct, compliance and ethics matters, or to report a suspected breach of legal, accounting or regulatory requirements, our **Code of Business Conduct** ('Code'), policies or standards.

SpeakUp complements, but does not replace the reporting of issues and concerns to your line manager, Legal, Human Resources (HR) or local Business Integrity lead. If you are not a Diageo employee, you are encouraged to raise your concerns with your most senior Diageo contact or via business.integrity@diageo.com.

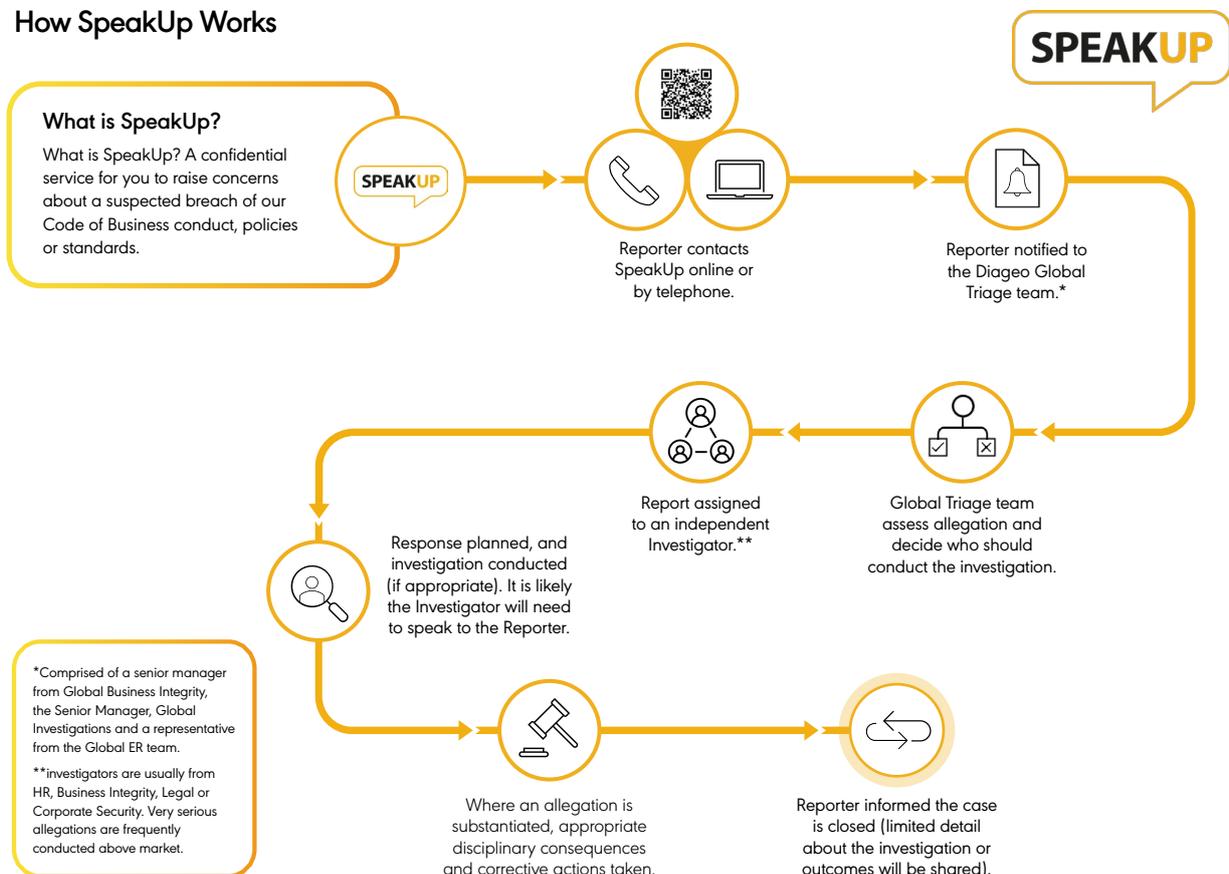
Management of SpeakUp is the responsibility of the Chief Business Integrity Officer, who reports to the Diageo General Counsel. In addition, the Chief Business Integrity Officer has an independent reporting line to the Chairman of Diageo's Audit Committee.



What happens when an employee contacts SpeakUp?

SpeakUp is managed by an external company, independent from Diageo, with staff trained to deal with whistle-blowing reports. You can contact SpeakUp online (www.diageospeakup.com) or by telephone. All SpeakUp telephone numbers can be found at www.diageospeakup.com.

How SpeakUp Works



Report a concern by phone

- When your call connects, you will hear an automated message in your local language. You will then be transferred to an operator who will answer in English.
- If you require a language other than English, you will be connected to an interpreter. This can take up to 15 minutes.
- Depending on the country you are calling from, you may be asked to confirm which company you are calling about: please state "Diageo". You will hear a short message, which includes a data privacy statement, which you will be asked to agree to before proceeding.
- The operator will ask you a series of standard questions to help us understand the exact nature of the concern or issue you are reporting. The more information you provide, the easier it is for us to investigate.
- You will be invited to provide your name. If you disclose this, every reasonable effort will be made to keep your name confidential, and it will only be revealed to individuals investigating your report, unless disclosure is required as a result of legal proceedings or a government investigation.
- You may remain anonymous, and, if you choose to do so, no attempt will be made to determine your identity through electronic means. However, it is generally difficult to investigate a report without the opportunity for a Diageo investigator to ask you more questions, therefore providing your contact information is likely to help the investigation.
- At the end of the call, you will be given a unique reference number, which you can use to check on the action being taken in response to your report.

Report a concern online

- Online reporting is available in 21 languages¹. The questions on the webform are the same as the questions asked by the operator if reporting a concern by phone. You will be given a unique reference number at the end of your report and asked to enter a password. You will need to be able to follow up on the progress of your report. (www.diageospeakup.com)

¹ Amharic, Bahasa Indonesian, Chinese (simplified), Chinese (traditional), Dutch, English, French, German, Greek, Hindi, Italian, Japanese, Korean, Polish, Portuguese, Russian, Spanish, Swahili, Thai, Turkish, Vietnamese.

² If you do not have access to Diageo's intranet, please contact business.integrity@diageo.com to request a copy of the Breach Management Global Standard.

Report a concern via QR code

- Scan the Speak Up QR code and make a report through your phone.
- As per reporting online, the questions on the webform are a simplified version of the questions asked by the operator if reporting a concern by phone. You will be given a unique reference number at the end of your report and asked to enter a password. You will need to be able to follow up on the progress of your report.
- Reporting via QR code is the quickest/easiest way to share your concerns.



Deciding upon initial response to the report ('triaging')

All reports via SpeakUp go directly to a triage team within Diageo.

- For Code related issues: Senior Global Business Integrity Manager and the Senior Manager, Global Investigations.
- For people related issues: (e.g. discrimination, harassment or bullying): Senior Global Business Integrity Manager and a Global ER team member.

The triage team receives automatic notifications of all new cases reported. The Senior Counsel, Global Legal Compliance & Business Integrity also has access to all cases for oversight purposes only.

Twice a week, reports are reviewed by the triage team. Where functional expertise is required to properly assess an allegation, a senior leader with the appropriate functional experience assists in the review. The outcome of triage is an initial assessment of how Diageo should respond to the allegations contained in the report.

Code-related allegations are usually assigned to the relevant market Business Integrity lead, and people related issues to the market HRD. They will then determine next steps, including whether the matter requires formal investigation. Where there are valid concerns about the independence of a market led investigation, or where the allegations made are considered sufficiently serious to require management above market, the triage team will determine how to manage. In all instances, every effort shall be made to ensure that those receiving and investigating reports will have sufficient independence and impartiality. A definition of issues that require oversight by a global team is contained within the **Breach Management Global Standard**.²

How Diageo will manage the allegation

How Diageo will respond to an allegation is set out in the Breach Management Global Standard. The response will depend on the information provided, and there is no presumption that a report to SpeakUp will automatically trigger a formal investigation. The procedure to be followed will also depend on local laws and arrangements with trade unions, Work Councils or other employee bodies (as applicable). For additional information of specific in-country procedures, please contact in-country HR, Legal, Corporate Security or your local Business Integrity lead, or, if you are not a Diageo employee, your most senior Diageo contact.

If an investigation is required, a single Diageo employee will take responsibility for being the case leader - seeing the allegation through to conclusion, which includes maintaining communications with the reporter. This employee may be different from the individual(s) conducting the investigation.

Communication with the reporter during and after an investigation

If you make a report and provide your name then (subject to specific in-country procedures) you should expect to be informed who the case leader is, and how and when they will contact you during any investigation. Depending on the information included in your report, you may be asked to provide more detail or evidence to support your allegation(s). Subject to confidentiality considerations and specific in-country procedures, you should also expect to be informed about the final outcome of the investigation.

Communications with you will be more difficult if you choose to remain anonymous. However, by using your unique SpeakUp reference number or PIN, you can follow up on progress with your report and see whether those investigating it require further information.

Confidentiality

Anyone involved in an investigation (including the reporter and any individuals interviewed as part of the investigation process) should have an expectation of confidentiality - your name will only be made available on a strictly "need to know" basis.

If you are interviewed during an investigation, you are required to maintain confidentiality and not share with anyone any of the contents or the existence of your interview, or any details regarding your involvement in the investigation at all. Failure to maintain confidentiality may be considered a breach of our Code.

Further communications with the case leader

If you have been involved in an investigation and have any outstanding questions and/or wish to provide additional information, you should contact the case leader. If you are unaware of who that is, you can request this information from your local Business Integrity lead, the Global Business Integrity team (business.integrity@diageo.com) or via SpeakUp. If you have reported anonymously, you may continue your communications anonymously, e.g. via the follow-up function in SpeakUp.

Preventing and responding to retaliation

Diageo has a zero-tolerance towards retaliation against anyone who has reported an allegation or supported an investigation in good faith. Any form of retaliation is considered to be a breach of our Code and therefore will be treated very seriously. Retaliation can take many forms, so it is important to be alert for signs. Retaliation can include:

Direct retaliation:

- Unfair disciplinary procedures including warning, demotion or termination
- Direct threat, harassment, unfair treatment or discrimination
- Negative performance appraisal (that is unwarranted)
- Change to an unpopular job, given unpleasant tasks to do, or a heavier or lighter workload
- Removal of benefits, or development and coaching

Indirect retaliation:

- Withholding information
- Isolation from the team
- Exclusion from meetings or discussions important to advancement or performance
- Overlooked for recognition
- Hostile work environment
- Not included for promotion or new role opportunities coaching

If you witness or are subject to retaliation, you should report it to Legal, HR, Business Integrity or to SpeakUp, providing as much information as possible.



DIAGEO

DIAGEO How SpeakUp Works

UPDATED SEPTEMBER 2023