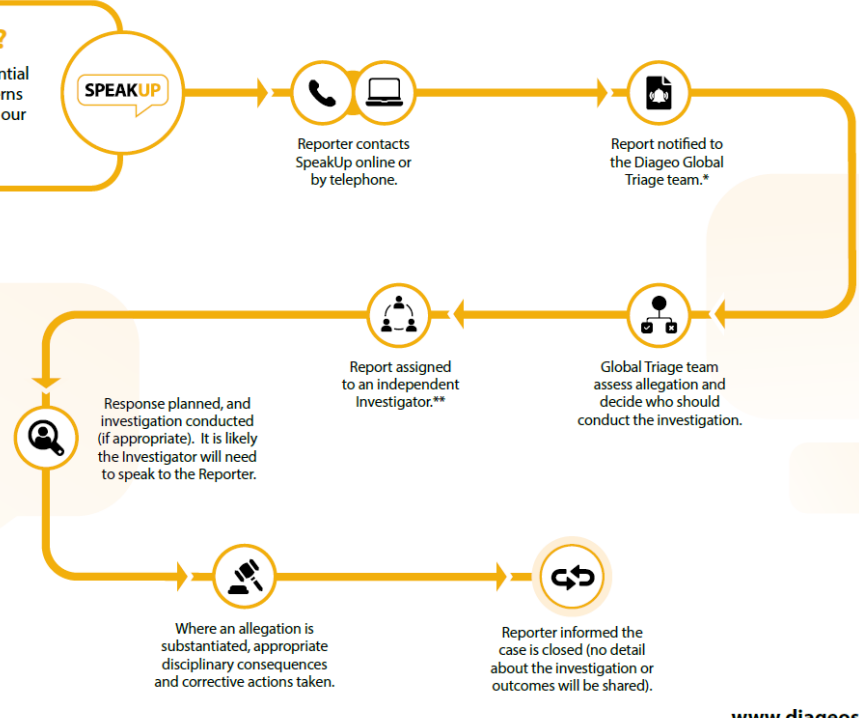


### How SpeakUp Works



#### What is SpeakUp?

What is SpeakUp? A confidential service for you to raise concerns about a suspected breach of our Code of Business Conduct, policies or standards.



\*Comprised of a senior manager from Global Business Integrity, the Global Head of Investigations, and a global HRD

\*\*Investigators are usually from HR, Business Integrity, Legal or Corporate Security. Very serious allegations are frequently conducted above market

[www.diageospeakup.com](http://www.diageospeakup.com)

### 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 reporting 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.

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](http://www.diageospeakup.com)) or by telephone. All SpeakUp telephone numbers can be found at [www.diageospeakup.com](http://www.diageospeakup.com).

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## 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 15minutes.
- 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 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.
- In some countries, anonymous reporting may only be used to disclose allegations relating to issues such as bribery, accounting misstatement or fraud – where such restrictions are in place, this will be made clear to you on the call.
- 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 ([www.diageospeakup.com](http://www.diageospeakup.com))

Online reporting is available in twenty one languages<sup>1</sup>. The questions on the webform are the same as the questions asked by the operator if report 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 both to be able to follow up on the progress of your report.

## Deciding upon initial response to the report (‘triaging’)

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

- For Code related issues: senior Global Business Integrity manager and the Global Head of Investigations.
- For people related issues: (e.g. discrimination, harassment or bullying) senior Global Business Integrity manager and a Global HR Director.

The triage team receive automatic notifications of all new cases reported. The Global Business Integrity Director 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, senior leader with the appropriate functional experience assists in the review. The

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

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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. A definition of issues that require oversight by a global team is contained within the [Breach Management Global Standard<sup>2</sup>](#)

## **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. Specific procedures may differ in individual countries – depending on local employment laws or arrangements agreed with trade unions, Works Councils or other employee bodies. 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 an 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 – including ongoing communication 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 you gave in your report, you may be asked to provide more detail or evidence to support your allegation. Subject to confidentiality considerations and specific in-country procedures, you should also expect to be informed about the final outcome of the investigation – although this is likely to be limited to an acknowledgement that your concerns were reviewed.

Communication 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 investigators require further information.

## **Communication with other employees during an investigation**

If you are not a reporter, but you are connected with an allegation, you may be contacted by the investigator to help establish what has happened.

If you are the subject of an investigation, then unless there are legal constraints, an increased risk of retaliation or doing so would prejudice the investigation, you should be informed of the specific allegation against you. Once the investigation has been concluded, subject to confidentiality considerations and

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<sup>2</sup> If you do not have access to Diageo's intranet, please contact [business.integrity@diageo.com](mailto:business.integrity@diageo.com) to request a copy of the Breach Management Global Standard

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specific in-country procedures, you should be informed about the final outcome and likely next steps. You will not be informed of the source of the allegation (unless required by local law).

Anyone involved in an allegation should have an expectation of confidentiality – your name will only be made available on a “need to know” basis. If you are interviewed during an investigation, you are required to maintain confidentiality and not share with anyone details of your interview or involvement. Failure to do so may be considered a breach of our Code.

## **What to do if communication is not what is expected?**

If you have been involved in an investigation and you do not receive the communication you were expecting, 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](mailto:business.integrity@diageo.com)) or via 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
- Unwarranted negative performance appraisal
- 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

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.