

Brambles

Speak Up Policy

Brambles Limited

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Version 4.0

SPEAK UP POLICY

1 This Policy

The purpose of this Policy is to reinforce and reaffirm Brambles' commitment to an open speaking up process in which employees and other eligible persons are encouraged to raise any concerns of Wrongdoing they may have. In today's environment, speaking up remains Brambles' first and best line of defense to Wrongdoing; when Wrongdoing is detected and reported, Brambles can take prompt, corrective action to fix it. We recognise that the early detection and reporting of Wrongdoing depends on maintaining a culture of trust and integrity in which all employees and other eligible persons:

- (a) are encouraged to report potential Wrongdoing as soon as possible, knowing that their concerns will be taken seriously and that appropriate action will be taken;
- (b) know and use the channels available to them to report concerns of Wrongdoing;
- (c) know the protections available and the steps that we will take to investigate reports; and
- (d) trust that the speaking up process is confidential and has no tolerance for victimisation, retaliation, retribution, or detrimental treatment of any kind.

This Policy is designed to comply with the *Corporations Act 2001* (Cth) and *Taxation Administration Act 1953* (Cth). For more information about the protection afforded to certain individuals who make a qualifying disclosure in Australia or about our Australian operations, please see Annexure I. inconsistency.

2 What Activities are Covered By This Policy?

Except where local or applicable law provides greater rights or remedies to individuals, in which case the local or applicable law shall prevail, this Policy applies to individuals who wish to disclose misconduct or an improper state of affairs or circumstances in relation to Brambles, including any of its group companies ("**Brambles**"). In this Policy, these activities are called "**Wrongdoing**" and include, but are not limited to:

- (a) criminal activity under any applicable law, including the laws of Australia and the European Union;
- (b) fraud;
- (c) breach of duty or trust;
- (d) conduct that represents a danger to the public, including dangers to health and safety and damage to the environment resulting from the release of toxic substances or environmental waste or violation of applicable environmental law or regulation;
- (e) questionable accounting, internal accounting or auditing mismanagement, including actual or threatened:
 - (i) fraud or deliberate error in the preparation, evaluation, review or audit of any Brambles financial statement;
 - (ii) fraud or deliberate error in the recording and maintaining of Brambles' financial records;
 - (iii) deficiencies or non-compliance with Brambles' internal accounting controls;
 - (iv) misrepresentations or false statements to or by senior officers or accountants regarding a matter contained in Brambles' financial records, financial reports, or audit reports;
 - (v) deviation from full and fair reporting of Brambles' financial condition; or
 - (vi) other activities that might represent a danger to the financial system;
- (f) breaches or suspected breaches of applicable tax laws or misconduct in relation to Brambles' tax affairs;
- (g) bribery or corruption;
- (h) human rights abuses;
 - (i) unethical conduct;
- (j) failure to comply with any legal or regulatory requirements not specifically mentioned above, including any laws administered by the Australian Securities and Investments Commission (**ASIC**);
- (k) conduct that compromises product safety and compliance, transportation safety, food safety or the protection of animal health or welfare;
- (l) breaches affecting the protection of personal or confidential data or the security of Brambles' network and information systems;

- (m) the unauthorised disclosure of trade secrets or proprietary or confidential information;
- (n) any breach of Brambles' Code of Conduct or other policies or procedure;
- (o) conduct likely to damage Brambles' reputation;
- (p) victimisation, retaliation or retribution for reporting concerns of Wrongdoing or for providing any information externally to a legal practitioner for the purpose of seeking advice or legal representation under any applicable whistleblower law or to any applicable regulator to assist it in the performance of its functions or duties under applicable law; or
- (q) the deliberate concealment of any of the above.

If you have reasonable grounds to suspect that any Wrongdoing has happened or is likely to happen, you should report it under this Policy. The various ways you can do this are explained in section 4 below. If you are uncertain as to whether an activity is covered by this Policy, you should speak to the Chief Legal Officer, the Chief Compliance Officer or any other member of the Legal and Global Ethics and Compliance Team.

In most cases, this Policy, and the reporting channels set forth in section 4 below, do not cover complaints relating to your own personal circumstances, such as the way you have been treated at work. Instead, in most cases, complaints about your own personal circumstances should be reported to your line manager or your human resources representative, who will take appropriate action. The confidentiality of any employee lodging an objectively reasonable complaint relating to their own personal circumstances will be respected, and no victimisation, retaliation or retribution will be tolerated.

3 Who Can Speak Up Under This Policy?

This Policy and the procedures described in this Policy are available to every current and former officer, employee, and associate of Brambles and any party with whom Brambles has or had a business relationship (such as Brambles' customers, suppliers, employees of suppliers, contractors, agents, distributors, volunteers, trainees and shareholders). This Policy and the procedures described in this Policy also apply to any relatives or dependents of any of the above, including a spouse, a dependant of a spouse, parent, or other linear ancestor, child, or grandchild or sibling, or to any other individual as prescribed by applicable law.

4 How To Raise A Concern

Brambles encourages all reports of Wrongdoing to be made to the Brambles' Speak Up hotline, which includes multiple channels for reporting. Reports made to the Speak Up hotline are received by an independent third party, Navex Global, 24 hours a day, seven days a week, and routed to the Global Ethics and Compliance Team. To raise a report using the Speak Up hotline, individuals may go to www.brambles.ethicspoint.com, which provides a listing of country- or region-specific, local or toll-free telephone numbers or links to the available online reporting system, or consult the Speak Up posters in Brambles' facilities. Using the Speak Up hotline is the best way for Brambles to ensure reports of Wrongdoing are dealt with promptly, securely and in accordance with this Speak Up Policy. While Brambles encourages reporters to identify themselves, reporters may make a report on an anonymous basis using the Speak Up hotline.

Additionally, we hope all employees will feel comfortable raising concerns about actual or possible Wrongdoing openly and, where they feel comfortable, reports may be made orally or in writing directly to:

- your line manager;
- the Chief Legal Officer and Group Company Secretary;
- the Vice President and Regional General Counsel, EMEA;
- the Vice President and Regional General Counsel, Americas and Asia;
- the Chief Compliance Officer; and
- any member of Brambles' Internal Audit team.

Finally, there may be certain circumstances where individuals believe that they cannot communicate a concern of Wrongdoing using any of the channels listed above. In such a situation, that individual may communicate directly with the Chair of the Board or the Chair of the Audit & Risk Committee, who may be contacted by and through the Head of Legal and Group Company Secretary at GPO Box 4173, Sydney NSW 2001, Australia. Any communication to the Chair of the Board or the Chair of the Audit & Risk Committee should be clearly marked as

“Confidential-Eyes Only”. With this marking, the communication will be forwarded directly to the Chair of the Board or the Chair of the Audit & Risk Committee and will not be opened by the Chief Legal Officer. Individuals also may communicate with Brambles’ external auditors by contacting ethics.help@au.pwc.com or, for persons located in Australia, on 1800 487 878.

Regardless of the channel used, employees must report suspected Wrongdoing as soon as practicable. Reporting Wrongdoing as soon as possible allows Brambles to undertake an investigation and remedy or eliminate it and to minimise any adverse consequences which may arise from it.

You may report suspected Wrongdoing anonymously. However, as it is much more difficult and often impossible to investigate suspicions which are reported anonymously, you are encouraged, but not required, to give your identity. Any reports made, whether anonymous or not, should include sufficient detail to allow Brambles to investigate the matter fully. For example, it is important to provide information about the names of the people allegedly involved in, or witness to, the incident(s), the dates and times of the incident(s) (approximate or exact), where the incident(s) occurred, and why the employee believes the incident(s) should be reported. Insufficient detail may prevent Brambles from addressing the matter appropriately.

Any employee who believes that he or she has been personally involved in Wrongdoing is expected to report such incident(s). Self-reporting will be considered when deciding whether or what disciplinary action may be appropriate.

The goal of this Policy is to provide an internal mechanism for reporting, investigating and remedying any Wrongdoing. Sometimes individuals will have concerns that relate to the actions of a third party, such as a customer, supplier, or service provider. We strongly encourage you to report such concerns internally before raising them with any third party. You should utilise one of the channels for reporting set out above for guidance. Nothing in this Policy, however, prevents you from reporting Wrongdoing or providing information to, testifying or otherwise assisting ASIC, the Australian Commissioner of Taxation or any other applicable regulator performing its functions or duties consistent with or in relation to applicable law.

5 Confidentiality Is Respected

If you report Wrongdoing on reasonable grounds, your identity and any information which is likely to lead to your identification will be kept in confidence and will be shared only on a “need-to-know” basis with those responsible for investigating or resolving the concern. We will store all information about a report securely and consistent with our Data Classification Policy and Document Retention and Data Destruction Policy and Schedule. We also will redact your identity from all relevant documents.

For those reports of Wrongdoing covered by Annexure I, the legal protections available under the Australian whistleblower laws, as set out in section 8 of Annexure I, will apply.

6 No Victimisation

We understand that individuals are sometimes worried about possible repercussions associated with complaints of Wrongdoing. Please know that we encourage openness and will support any person who has reasonable grounds to raise suspicions of Wrongdoing under this Policy, even if they turn out to be mistaken.

We will not tolerate direct or indirect victimisation, retaliation or retribution of any kind to any person who makes a report under this Policy or conducts, assists or participates in an investigation into a report made under this Policy. Any employee found to have engaged in such behaviour against a person because they believe that the person has made, may make, proposes to make, or could make a report under this Policy or has assisted, may assist, proposes to assist, or could assist in an investigation will be subject to appropriate discipline, up to and including the possible termination of employment. We interpret victimisation, retaliation or retribution broadly to include any act or omission which causes, or threatens to cause, any detriment (collectively, **Detrimental Treatment**), and such Detrimental Treatment includes, amongst other things:

- suspension, layoff, dismissal or equivalent measures;
- demotion or withholding of promotion;
- withholding of training;
- negative performance reviews;

- altering an employee's position, status or contract (to include working terms and conditions) or other person's position, status or contract to his or her disadvantage;
- disciplinary action or other form of injury to an employee in his or her employment;
- discrimination, harassment, intimidation, threats, current or future bias or other unfavorable treatment;
- harm or injury to a person, including psychological harm or damage to a person's reputation;
- damage to a person's property, business, or financial position; and
- negative employment references, blacklisting or business boycotting.

If you believe that you have suffered, or someone else has suffered, any such Detrimental Treatment, you should report your concerns using one of the reporting mechanisms identified in section 4 above immediately.

7 Investigative Process

Once you have raised a concern, Brambles will evaluate it to determine the appropriate next steps. Brambles' Legal and Global Ethics and Compliance Team is the function designated to receive and investigate, or oversee the investigation of, reported Wrongdoing. Promptly, and within seven days of receipt of your report, a member of Brambles' Legal and Compliance Team will acknowledge receipt of your concern.

In some cases, Brambles may appoint an internal or external investigator or team of investigators, including staff with relevant investigative experience or with special knowledge of the subject matter. At your request, Brambles will arrange for a physical, in-person meeting with the appointed investigator within a reasonable timeframe.

No one will be judged to have engaged in Wrongdoing or misconduct until the investigation, if any, is complete and they have had a chance to respond to the allegations. All investigators will treat witnesses in a professional manner and with dignity and respect. Depending on the outcome of an investigation, in addition to potential disciplinary action, the investigators may make recommendations for change to enable Brambles to minimise the risk of future Wrongdoing.

Brambles will aim to keep any person who raises a concern of Wrongdoing informed of the progress of any investigation and its likely timetable for completion. We also will aim to complete all investigations within a reasonable timeframe not exceeding three months, or six months where the facts and circumstances surrounding the concern require, and provide feedback regarding the same. However, sometimes the need for confidentiality and legal considerations may prevent us from giving the person who raises a concern of Wrongdoing specific details of the investigation or any disciplinary action taken as a result.

It is a very serious matter to raise a concern which you know to be false, and if we determine that a false complaint has been made without reasonable grounds for doing so, we may conclude that such actions amount to gross misconduct, warranting discipline up to and including the possible termination of employment.

8 Cooperation

All employees are expected to cooperate fully with any investigation under this Policy, providing complete and truthful information. Any employee who fails to cooperate with an investigation or lies to or misleads Brambles will be subject to disciplinary action up to and including termination of employment.

Employees who have been informed or become aware of ongoing investigations for which they have potentially relevant records (*e.g.*, memoranda, electronic mail, instant messages, files, notes, photographs, and recordings, *etc.*) must retain these records and provide them to Brambles. Any employee who knowingly destroys or alters potentially relevant records or information will be subject to disciplinary action up to and including the possible termination of employment.

9 Reporting Speak Up Matters

Subject to the confidentiality protections set out in section 5 above and in Annexure I, where applicable, reports of Wrongdoing may be used for limited reporting purposes, including to the Brambles' Board of Directors and its Audit & Risk Committee.

10 Support

We recognise that raising a concern of Wrongdoing, or participating in an investigation (either as a witness, an accused or as an investigator), can be difficult and uncomfortable. In certain circumstances, including to protect you from the risk of Detrimental Treatment, Brambles may, on a case-by-case basis, allow you to perform your

duties from another location or in another role at the same band level. We also may reassign or relocate other Brambles employees allegedly involved in the Wrongdoing while the investigation is ongoing.

Additionally, Brambles' employees and their families can contact [Brambles' Employee Assistance Program \(EAP\)](#) for support. EAP provides free, confidential, short-term support services by qualified professionals to Brambles' employees and their immediate family members, either face-to-face, over the phone or through the internet. Information on how to contact the [EAP](#) is available on Walter.

11 Further Information

If you would like further information on this Policy, we encourage you to contact Brambles' Chief Legal Officer, Brambles' Chief Compliance Officer or any member of the Legal and Global Ethics and Compliance Team.

12 Maintenance Of This Policy

This Policy, including Annexure I, is available internally to all employees through the Global Ethics and Compliance Hub on Walter and externally to all individuals on the Brambles website at <https://www.brambles.com/corporate-governance-overview>. Additionally, hard copies of this Policy, including Annexure I, are available at every plant or service center owned or operated by Brambles. The manager of each such facility will be responsible for ensuring that the current form of this Policy, including Annexure I, is available in hard copy in a canteen, breakroom or any other location where other policies, procedures or manuals may be accessed freely.

13 Responsibility For The Success Of This Policy

The Brambles Board has overall responsibility for this Policy and reviewing the effectiveness of actions taken in response to concerns raised under this Policy. The Risk and Audit Committee has responsibility for:

- (a) ensuring appropriate mechanisms are in place to protect against Detrimental Treatment; and
- (b) the communication and compliance with this Policy throughout Brambles.

The Chief Compliance Officer has day-to-day operational responsibility for this Policy and ensures that all managers and other staff who may deal with concerns or investigations under this Policy, including Eligible Recipients as defined in Annexure I, receive regular and appropriate training.

The Chief Legal Officer, in conjunction with the Board, will review this Policy from a legal and operational perspective at least once a year. This Policy does not form a part of any employee's employment contract, or otherwise create contractual rights or obligations, and it may be amended from time to time.

All employees are responsible for the success of this Policy and should ensure that they use it to disclose any suspected Wrongdoing. Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Legal Officer.