

January 2025

## INEOS Speak Up Privacy Notice

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### Introduction and information about the controller

INEOS Holdings Limited (“INEOS”, “we”, “us” and “our”) has set up a whistleblowing system and reporting hotline known as “Speak Up”. INEOS is the data controller for the processing of personal data provided through the Speak Up system. This INEOS Speak Up Privacy Notice (“Notice”) describes how and why personal data is collected and processed in connection with Speak Up. It is intended to comply with our obligations to provide individuals with information about the processing of personal data under applicable privacy laws.

In relation to the information you provide through Speak Up, INEOS is the controller / responsible party. However, the personal data in your report may be shared on a need to know basis with other entities in the INEOS group, including (where relevant), the INEOS entity that is your employer, in order to properly investigate and resolve the issues reported. Where this is necessary, those other INEOS entities will also act as controllers of your personal data.

Speak Up is a free confidential online reporting service, through which concerns about potentially unethical, unlawful or unsafe conduct and practices can be reported and investigated. It is independently managed on our behalf by an external service provider, NAVEX Global, Inc., a Delaware corporation (“NAVEX”).

This Notice is supplementary to the [INEOS Privacy Policy](#) which is available online and any INEOS Employee Privacy Notice which is made available to INEOS employees from time to time (whether through the INEOS intranet or otherwise) – together referred to as the “Privacy Notices” – the content of the Privacy Notices continue to apply to Speak Up, in addition to the information set out in this Notice. In the event of any conflict or inconsistency between this Notice and another INEOS Privacy Notice, the terms of this Notice shall prevail.

If you have any questions about this Notice, any concerns relating to your personal data, or wish to exercise your privacy rights in relation to the Speak Up system, please contact [dataprivacy@ineos.com](mailto:dataprivacy@ineos.com).

### What personal data and information is collected and processed?

Speak Up captures the following personal data and information when a report is made, which may relate to the person making the report and anyone named in the report: (a) your name, employee number, job function and contact details (unless you report anonymously) and the nature of your relationship with INEOS; (b) a description of your concern, potential misconduct, or incident, and details of any personal

opinion you wish to make in connection with the incident; and (c) any additional personal data that may be generated and processed through the course of any investigation into the report.

If a report is made about your alleged conduct or involvement in a particular event or practice, where permitted by applicable laws, Speak Up will capture your name, surname, alias or nickname, description of function and contact information. Speak Up will capture information about the reported allegation. This may include information about alleged or proven criminal offences.

When making a report through Speak Up please do not provide any **sensitive data** relating to you or another person, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or concerning a person's sexual orientation and preferences or relating to criminal convictions and offences unless this information is essential for your report. Any such information which is provided by accident or in error will be promptly deleted.

All personal data collected by the Speak Up system will be managed confidentially by NAVEX and us and will only be disclosed as set out below.

INEOS recognises that an individual may not wish to be identified during the course of raising a concern. In such circumstances, we will do everything possible to protect their identity and will not disclose it without their consent. If it proves impossible to resolve the matter without revealing their identity, the investigation team will discuss with them whether and how to proceed. In some cases, however, confidentiality cannot be absolutely guaranteed as the very fact of the investigation may serve to reveal the source of the information, the statement of the person raising the concern may be needed as part of evidence against the perpetrator, or legal proceedings at a later stage may require the individual to appear as a witness.

### **What do we do with your personal data and on what legal basis?**

The personal data captured by Speak Up is used for the purpose of investigating, resolving the report, taking appropriate action to address the concerns raised, preventing similar concerns from arising in the future and for administering the Speak Up system. In some countries, INEOS has a legal obligation to maintain a whistleblowing helpline of this nature, and the processing of your personal data is necessary to comply with that obligation. In other cases, INEOS has a legitimate interest in making a whistleblowing helpline available to allow for the reporting of concerns within the scope outlined in this Notice and the [INEOS Speak Up Rules of Procedure](#), and INEOS takes steps, to ensure that the helpline is operated fairly, and any adverse impact on your rights and freedoms is mitigated. If you are in certain locations (not including the European Economic Area or the United Kingdom) our use of your personal data may be based on your consent, as provided below.

Sensitive data (as described above) will only be processed in relation to the Speak Up system, where authorised by applicable laws. For example, an allegation relating to discrimination in the workplace may necessitate the processing of sensitive data in order to carry out obligations and specific rights in the field

of employment, social security and social protection laws, or for substantial public interests. Some allegations made through the Speak Up system could amount to allegation of criminal activity, and we will process such data on the basis of substantial public interests and applicable laws e.g., to prevent or detect unlawful acts in the workplace.

### **Who may access your personal data and where will it be processed?**

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX, in the United States. NAVEX has entered into contractual commitments with INEOS to secure the information you provide in accordance with applicable laws. The personal data and information you provide may be accessed and used by relevant authorised personnel of INEOS (and, to the extent required, its third-party service providers and advisors) to the extent permitted by applicable laws and, in each case, on a need to know basis to process and investigate your report, adopt corrective measures, commence disciplinary or legal enforcement procedures or for such other purposes as described in this Notice. Such authorised personnel may include individuals in Human Resources, Finance, Business Advisory Services, Legal, Ethics and Compliance functions, senior management, external advisors (e.g., legal advisors and forensic companies), and/or, in limited circumstances, by technical staff of NAVEX. Those individuals may be located in the United States, Europe, the United Kingdom and elsewhere.

Depending on the subject matter and consequences of a report, it may be necessary to disclose your personal data to other third parties, including in particular to the police, courts and/or other enforcement and regulatory authorities. The relevant bodies that receive and process personal data may be in your country of employment, or another country. In the context of a criminal, disciplinary or regulatory investigation, INEOS will try to notify you in advance if such disclosure is required, except if this could hamper the ongoing investigation or legal or regulatory enforcement procedures.

For the reasons given above, personal data and information provided in a report may be transferred outside of your country of employment or home country. We put in place safeguards, including through contractual commitments, to ensure that your personal data receives an adequate level of protection and, depending on applicable laws, you may have a right to access these safeguards.

### **How long do we retain your personal data?**

Personal data provided in a report will be kept as long as necessary to process and investigate your report, or, if applicable, as long as necessary to take any needed remedial measures and in each case, for no longer than is permitted by applicable law. We may need to retain your personal data for a longer period to exercise, establish or defend our legal rights (for example, in the face of a challenge or potential or actual litigation) and to comply with any relevant legal obligations. At the end of the storage period, your personal data will be erased or irreversibly anonymised.

If a report does not fall within the scope of the Speak Up system, or the report is otherwise inadmissible, any personal data provided in the report will be erased or irreversibly anonymised as soon as practicable, and in accordance with applicable laws.

## **Your rights concerning your personal data?**

Depending on applicable laws, you may have certain rights in respect of the personal data you provide through the Speak Up system. These may include the right to request: (i) the erasure of personal data relating to you; (ii) the restriction of, or objection to, the processing of personal data relating to you; and/or (iii) to receive a copy of your personal data held through the Speak Up system. In addition, if you are the subject of the report, you may be able to correct personal data that is inaccurate or incomplete, or gain access to information concerning the report, except for the identity of the reporter. Certain conditions and restrictions apply to the exercise of these rights and, accordingly, INEOS may not be legally obligated to fulfil your request. In certain circumstances a fee will be payable in order to enable INEOS to respond to these requests.

To make any such requests or to raise a complaint, please contact [dataprivacy@ineos.com](mailto:dataprivacy@ineos.com). While you may also have the right to lodge a complaint with the relevant data protection authority, INEOS encourages you to contact us first to resolve your concerns. If you are an INEOS employee, and depending on your location, more information about the rights available to you locally, as well as INEOS's use of your personal data, will be available in the INEOS Employee Privacy Notice.

## **Notice of changes**

INEOS may change or update this Notice at any time in accordance with applicable privacy laws. Should we change our approach to data protection or modify the provided information on the processing of your personal data, as determined by applicable laws, you will be informed of these changes or made aware that we have updated the Privacy Notices or this Notice.