

January 2025

INEOS Speak Up Rules of Procedure

Who can submit a report through Speak Up?

Any person, including employees of INEOS and other interested third parties, may submit a report through Speak Up.

What can reports relate to?

Speak Up is a confidential channel through which you can report or notify INEOS of a concern or complaint about actual or potential unsafe, unlawful or unethical behaviour, violations of laws or regulations or INEOS' policies, including violations of human rights and environmental obligations, arising as a result of the actions or operations of INEOS, INEOS' employees, third parties working for INEOS or other stakeholders who have a business relationship with INEOS or who are indirect suppliers to INEOS.

How can reports be submitted?

You can make a report through Speak Up via telephone or online at any time and at no cost. To make a report by phone, you can access the toll-free number for the country from which you are calling [here](#). If you wish to make a report via the web-form, you can do so [here](#). Both options enable reporting in multiple languages and allow for the reporter to stay anonymous, if preferred.

INEOS employees can also make a report by contacting their line manager, HR department or another appropriate member of senior management directly. Any reports made by INEOS employees will be subject to, and managed in accordance with, the INEOS Employee Whistleblowing Policy.

What is the procedure after a report is submitted?

Acknowledgement

You will receive an acknowledgement of receipt of your report through the Speak Up system within 7 days of submission. If you have provided your contact details, we may use these to contact you. If you report anonymously, we may reach out to you via the Speak Up system, so please use your report key and password to return to Speak Up, either via the web-form or by calling the telephone line, to receive any updates or other communications.

Initial Assessment

All reports are initially assessed by the Speak Up team for admissibility, to determine if INEOS has all the necessary information in order to commence an investigation and to determine the scope of any

investigation. We will reach out to you to clarify any points or request further information. Admissibility of a report is determined at the absolute discretion of the Speak Up team. If admissible, the Speak Up team will then assign the report to an appropriate investigation team which may include external third parties in line with applicable laws.

Reports that fall outside the scope of the Speak Up system, contain insufficient information for an investigation to be conducted (and the reporter fails to respond to requests for further information in a timely manner), are malicious or vexatious in nature, or constitute retaliation against those categories of individuals who are legally entitled to protection from retaliation, may not be accepted for investigation by INEOS, in which case the reporter will be notified through the Speak Up system.

Investigation

INEOS aims to undertake all investigations as quickly as reasonably possible and within three months of acknowledgement of receipt of the report. However, the nature of reports can vary significantly and depending on the severity of the matter, the type of investigation and other factors, the investigation may take more time to complete. For complex investigations which cannot be concluded within three months, subject to confidentiality and legal obligations, INEOS will aim to keep the reporter informed (whether through the Speak Up system or using the contact details provided) of the progress of the investigation and, where appropriate, the likely timescale for its completion. Where possible, and if INEOS deems it necessary, the investigation may include a meeting between the reporter and the investigation team.

Closure and feedback to reporter

After the investigation is completed, the report will be closed and you will be notified through the Speak Up system. If and where possible, at INEOS's absolute discretion and respecting all obligations of confidentiality and applicable laws, the investigation team may report back to you on the outcome of the investigation (including if and why the report was considered to be founded or unfounded) and any actions taken.

How are reporters protected from retaliation?

INEOS does not tolerate retaliation against individuals who, in good faith, report a concern through Speak Up. Any report of retaliation is taken seriously and investigated as appropriate. Suspected instances of retaliation can be reported via Speak Up and INEOS will take necessary action against anyone who is found to be pursuing or threatening any form of retaliation.¹

To maintain the confidentiality of an investigation, information about investigations is shared on a “need-to-know” basis only and investigators are trained to keep reports in the utmost confidence. Any INEOS

¹ These protections do not extend to those making malicious reports or those who do not have genuine concerns and reasonable grounds to believe that the information is true at the time of reporting.

employees involved in the investigation of a report will take steps to ensure that the information about, and materials relating to, the investigation, written or verbal, are safeguarded. Technological and procedural safeguards ensure that individuals mentioned within a report are prevented from viewing its contents in NAVEX, even if they are a member of the Speak Up team or usually tasked with investigation.

Can reports be made anonymously?

Individuals may choose to report concerns anonymously through the Speak Up system. If you wish to remain anonymous, you need to ensure that your report does not reveal your identity by accident. The Speak Up system also allows for anonymous contact between reporters and the investigation team if you wish to follow up on your report or share further information anonymously.

Review of effectiveness of Speak Up

We review the effectiveness of Speak Up on an ad hoc basis if needed, but at least once a year.

Responsibility

Speak Up is overseen and managed by the INEOS Speak Up team, who ensure that reports are investigated and resolved in an appropriate manner.