



THE SPEAK UP POLICY

BETA GLASS PLC



THE SPEAK UP POLICY OF BETA GLASS PLC

AIM & SCOPE

The BETA GLASS Speak Up Policy aims to ensure individuals including the company's employees; both full time and part-time, contractors, vendors, shareholders, job applicants, and other members of the general public are:

- Encouraged to feel confident in raising serious concerns about malpractices, to question and act upon concerns, which they consider violations of the company's procedures, corruption actions, unethical conduct, discrimination of any kind, conduct which is, has been or is likely to be an offence or breach of law.
- Provided with avenues to raise concerns and receive feedback on any action taken,
- Given a response to their concerns of malpractice and are aware of how' to pursue them if not satisfied,
- Reassured that they will be protected from reprisals or victimization if they have reasonable belief that any disclosure has been made in good faith, it does not matter if they are mistaken. This assurance does not however extend to those who are found to have raised a matter knowingly falsely or maliciously.

All concerns will be treated as highly confidential and sensitive and every effort will be made not to reveal your identity if this is your wish. However, in certain cases, it may not be possible to maintain confidentiality especially if you are required to come forward as a witness.

The procedure described below is in addition to the Grievance Procedure described in the Company's Code of Business Conduct, which continues to be the appropriate way to raise personal issues relating to your employment.

Anonymous Allegations

You may raise your concern verbally or in writing and should include full details and if possible, with supporting evidence. Whenever possible you should put your name *to* your allegation to enable a more purposeful examination of the allegation.

In assessing an anonymous allegation, due care will be taken to conduct the investigation fairly and equitably.

Anonymous allegations will be treated diligently and similar procedure will be followed as in the case of "non- anonymous" complaints.



The term "malpractice" includes but is not exhaustive of:

- Conduct which is an offence or a breach of legal obligations (including negligence, breach of contract, breach of administrative law).
- Health and safety risks, including risks to the public as well as to other employees.
- Bribes or kickbacks or possible fraud and corruption
- Information Security Breach
- Questionable accounting. e.g. Violation of Accounting standards
- Other unethical conduct. E.g. Harassment or discrimination, etc.
- Damage to the environment.
- Others

If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under the Speak Up Policy they will not be at risk of losing their job nor suffer any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

Confidentiality

Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardize the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential.

There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure.

Equally, should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the Police. In these circumstances, again, the implications for confidentiality will be discussed with you.

Reporting procedure:

The earlier a concern is raised the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you need to demonstrate that there are sufficient grounds for your concern.



All malpractice concerns should be raised with the Company's Speak Up Channel. Upon receipt of the allegation, the Internal Audit Manager will promptly review same to ensure that the facts alleged are substantive to warrant an Investigation.

Communication channels

Allegations can be confidentially reported either online or by phone, using our Speak Up Service frigoglass.ethicspoint.com. The Speak Up Service is run by an independent third party and is available 24/7, 365 days a year. English is the preferred language.

Online	To file a concern online, visit the Speak Up Service's website at frigoglass.ethicspoint.com where you can fill in a form to submit your concern.
By Phone	07080601816. At the English prompt, dial 855-229-9304

These channels are in alignment with the legislation concerning the processing of personal data.

Possible outcomes of the investigation could be that;

- the allegation could not be substantiated; or
- action has been taken to ensure that the problem does not arise again. You will not, however, be given details about the action taken as this could breach the human rights of the person involved.

Responsibility

All persons referred to within the scope of this Policy are required to familiarize themselves with the terms of this Policy. Individual managers are responsible for ensuring that this Policy is communicated and applied within their respective areas of responsibility.

Any queries on the application or interpretation of this Policy must be referred to the Chairman of the Governance and Remuneration Committee prior to any action being taken.



REMEMBER

Integrity and Social **Responsibility** are the **foundation** for **everything** we do.
It means that we stick to our Business Principles and that we insist on our Core
Values

AMENDED BY THE BOARD THIS 24th DAY OF NOVEMBER 2022

Managing Director

Company Secretary