



# Enza Zaden

## Speak Up! Procedure

ENZA ZADEN



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# Speak Up! Procedure

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# Foreword

Working at Enza Zaden means adhering to certain principles. Our reputation, and therefore our future, relies on the behavior of each Enza Zaden employee, wherever they are in the world. Our conduct and the values we share determine our company culture. We work as a team based on trust, respecting each other as unique individuals. We believe in the importance of an open and safe corporate culture.

We therefore work in accordance with the Enza Zaden Business Ethics Code. This code of conduct sets out how we engage with each other and conduct business respectfully, with integrity and transparency.

If you encounter behavior that may be at odds with the Business Ethics Code or could be considered wrongdoing as described below, make yourself heard and express your concerns following the instructions in the accompanying Speak Up! Procedure. We understand that it can take courage to make your voice heard. That's why we aim to foster a corporate culture without fear of reprisal or unfair treatment when you raise such concerns. Help maintain Enza Zaden's reputation and the health and safety of our organization, both now and in the future. Speak Up!

## **The Enza Zaden Board of Directors**

Jaap Mazereeuw  
René Ruiter  
Allison Thomas  
Andreas Sewing  
Dirk Neelis

# Speaking up!

## WHY this Speak Up! Procedure?

We want to do business in a fair and honest way. That requires an open corporate culture. A culture that offers a safe environment in which we all feel comfortable asking questions and expressing concerns related to our Business Ethics Code.

We need your help to act and to improve the situation before it's too late. So, express your concerns about behavior, situations, or incidents that you feel or suspect are not in line with our Business Ethics Code or other applicable rules. Staying silent will definitely not improve the situation and may in fact make the situation worse.

You're not on your own; you can share your concerns and ask questions at any time.

You can find the Business Ethics Code at EnzaPlaza, under 'Our Company'. External parties can find the Business Ethics Code at [www.enzazaden.com](http://www.enzazaden.com)

## WHO can use this Speak Up! procedure?

The Speak Up! procedure is an internal procedure for all employees, managers, temporary staff, trainees, and agency staff who have concerns about wrongdoing, including behavior that is not in line with the Business Ethics Code.

External parties such as former employees, job applicants, subcontractors and their employees, suppliers, and all other parties with whom Enza Zaden collaborates can also express their concerns in line with this Speak Up! procedure.

## WHAT kinds of concerns can you report?

This Speak Up! Procedure applies to all forms of wrongdoing. This concerns behavior, situations, or incidents that you feel or suspect are not in line with our Business Ethics Code.

The Business Ethics Code addresses a wide range of relevant topics. Behavior or activities that are not in line with the code may result in misconduct, meaning a violation of national or international laws or regulations, or activities or behavior that can harm the public interest. Concerns may also relate to an integrity matter or inappropriate behavior that compromises the safety (social or otherwise) of individuals. This can also include wrongdoing that is not directly addressed in the Business Ethics Code but is still considered as such.

## WHAT if you have doubts or if you need advice?

If you are not sure whether certain behavior is permitted or if you want to use the Speak Up! procedure, you can ask for advice from the Business Ethics Officer or contact a confidential advisor.

Their door is always open to you, and they can advise you on the best route to follow and steps to take. They do not make written reports of such requests for advice. You will find the contact details of the confidential advisors on EnzaPlaza.

Besides consulting our confidential advisors, you can also ask for confidential advice from national external whistleblowing authorities.

## WHEN and HOW to Speak Up?

The Speak Up! Procedure should be followed when you have a concern as mentioned in 'What kinds of concerns' above. A first step that can be taken is to discuss your concern with your supervisor. In many cases, this can lead to a quick and suitable solution. For external parties, the first point of contact for raising concerns is your regular contact within Enza Zaden.

If you don't feel comfortable discussing your concerns with your supervisor, you can report them via this Speak Up! Procedure. (Your supervisor may also advise you to follow this Speak Up! Procedure when you consult them).

Reports can be made in various ways:

- In writing (via email) to the Business Ethics Officer at [speakup@enzazaden.nl](mailto:speakup@enzazaden.nl) or via the web portal of the external Enza Zaden SpeakUp! Line (details below);
- By phone to the external Enza Zaden SpeakUp! Line;
- In a face-to-face meeting with the Business Ethics Officer (if possible within a reasonable period of time).

You can find details of the external Enza Zaden SpeakUp! Line on EnzaPlaza, including a link to the portal for the SpeakUp! Line as well as a local telephone number for each country. Anonymous reporting is possible via the reporting line. Your report will always be sent to the Business Ethics Officer for follow-up.

If you report verbally, either a recording of the conversation (with your consent) or a detailed written report will be drafted and shared with you for review, correction, and approval.

### Who is involved in the Speak Up! Procedure internally?

- The Business Ethics Officer (BEC) acts as the coordinator and contact person for stakeholders during the entire Speak Up! Procedure. The BEC is responsible for receiving reports, either directly or via the external Enza Zaden SpeakUp! Line, keeping the reporter updated during the entire procedure, and serving as secretary of the Integrity Committee.

- The Integrity Committee (IC) is chaired by our CFO (a member of the Board of Directors) and also consists of the Business Ethics Officer and the VP HR. The Board of Directors can appoint one or more additional members or replace members of the Integrity Committee. The committee may also set up one or more subcommittees for specific tasks. The Integrity Committee is responsible for (i) monitoring the enforcement of the Business Ethics Code and this Speak Up! Procedure, (ii) investigating specific reports directly or appointing internal or external investigators to investigate a specific report, and (iii) recommending disciplinary actions or other measures.

Furthermore, the Integrity Committee follows trends and developments in business conventions and ethics in general and monitors the implementation of decisions by the Board of Directors or the Supervisory Board regarding the Business Ethics Code and this Speak Up! Procedure. It also periodically reviews decisions made under this Speak Up! Procedure.

- The Integrity Committee can appoint internal and/or external investigators at the central and/or local level to conduct investigations in relation to reports. The investigators work in accordance with the Investigation Protocol. They have temporary responsibility for investigating reports and report back to the IC.

# What happens after you report your concern?

## Confirmation of receipt

The Business Ethics Officer will log your report and confirm its receipt in writing as soon as possible, but no later than within five (5) working days.

If you contact the external Enza Zaden SpeakUp! Line, you will receive a unique case number. You can use this number to check the status of your report and/or to provide additional information. Communication will be handled in the Enza Zaden SpeakUp! Line portal, unless you agree to direct communication with the Business Ethics Officer by email.

## Initial assessment as to whether your report falls under the Speak Up! Procedure

After confirming receipt of your report, the Business Ethics Officer will assess whether it falls under the scope of this Speak Up! Procedure or whether it should be handled via another appropriate procedure. If the latter applies, you will be informed about the correct procedure.

The Business Ethics Officer may consult the Integrity Committee if necessary.

If further information is needed for this initial assessment, you will be contacted and asked to provide more information.

## If your report falls under our Speak Up! Procedure, an investigation will be conducted

If the Business Ethics Officer determines that your report falls under the scope of this procedure, they will contact the Integrity Committee and may advise them on the investigation.

The Integrity Committee is chaired by our CFO (member of our Board of Directors) and also includes (i) the Business Ethics Officer (secretary of the IC) and (ii) the VP HR.

The Integrity Committee decides on the next steps for the investigation. They may decide to investigate the report themselves, delegate its investigation to appropriately appointed persons internally, or appoint an external third party. The Investigation Protocol describing how the investigation is performed can be found in the annex to this procedure.

You can ask the Business Ethics Officer to have your report handled at the local subsidiary level where you work. In this case, the Business Ethics Officer will inform the Integrity Committee who will appoint a local contact person to act as coordinator for the investigation, and will advise on subsequent steps.

The Business Ethics Officer can refuse requests to have reports handled at the local level if the issue involves a member of the Integrity Committee, senior management (Board – 1 level), Board of Directors, or Supervisory Board, if the report relates to conduct by local management, or if the scale of the damage requires an investigation at the central level or poses a risk of reputational damage to the entire company.

If the Business Ethics Officer is the subject of the issue, the report can be submitted directly to the VP HR. The VP HR will then contact the CFO (as a member of the Integrity Committee) for further handling and investigation.

If the VP HR is the subject of the issue, the report can be submitted directly to the Business Ethics Officer, who will then contact the CFO (as a member of the Integrity Committee) for further handling and investigation.

If a member of the Board of Directors is personally involved in the report, the Business Ethics Officer will contact the Chairman of the Supervisory Board and the VP HR (as a member of the Integrity Committee) for further handling and investigation.

All employees must cooperate fully and immediately with an investigation and must answer all questions fully and honestly. In the interests of the investigation, employees may not discuss it with anyone, even their manager.

## Informing the person(s) involved

If you have made a report about a particular person, they will normally be informed about the report as soon as possible. An exception may be made if it is anticipated that this will seriously impede the investigation and will consequently obstruct the enforcement of Enza Zaden's rights as part of any judicial proceedings. If the person involved cannot be immediately or fully informed, they will be informed or updated as soon as the investigation permits.

## Receiving a status update

Within eight (8) weeks of the date on which your report is received, you will receive a written update from the Business Ethics Officer about the progress of the investigation.

## Notification of the outcome of the investigation

Within three (3) months of confirmation of receipt of the report, the Business Ethics Officer will inform you about the outcome of the investigation, including Enza Zaden's position regarding the report and any measures or actions taken or recommended in the future.

## If your report is deemed justified

The results of the investigation are sent to the Integrity Committee for review and a decision. If your report is deemed fully or partially justified, the Integrity Committee will issue a binding recommendation to the senior management of the department concerned (Board - 1 level), or, if relevant in light of the subject matter, to the Board of Directors about the measures to be taken and the persons to be informed. These may be disciplinary measures against particular individuals or organizational measures to prevent a recurrence of similar incidents.

## If you do not agree with the decision or the procedure followed

If you have reported a concern and after careful consideration you are of the opinion that:

- a. your report has not been handled in accordance with the Speak Up! procedure or the Investigation Protocol, or
- b. you have reasonable grounds to disagree with the outcome of the investigation and the position Enza Zaden has taken with regard to the report, you can contact the Business Ethics Officer. The Business Ethics Officer will then contact the IC to determine the appropriate follow-up.

# What to expect when you follow the Speak Up! Procedure

## Legal protection - no negative consequences

If you report a concern in good faith that falls within the scope of the Speak Up! procedure, you will not face any retaliation or harmful treatment. This means that Enza Zaden will not tolerate any negative consequences such as threats of suspension (paid or unpaid), dismissal, demotion or refusal of promotion, changes in duties, change of workplace, different working hours, negative performance feedback, intimidation, harassment, discrimination, or unfavorable or unfair treatment.

If you nevertheless feel that you are being punished or treated unfairly, please inform your manager, the confidential advisor, the Business Ethics Officer, or the external Enza Zaden SpeakUp! line. In such cases, the Integrity Committee will instruct the concerning (local) management to take disciplinary measures against the offender(s).

A condition for protection is that you have reported in good faith. This means that you have reasonable grounds, supported by facts, to believe that the information reported is accurate at the time of reporting. You do not need to provide evidence for your report. Even if no violation is found, no action will be taken against you if you expressed your concern in good faith.

However, submitting a report in good faith does not automatically protect you from any negative consequences if the investigation reveals that you were involved in the matter reported yourself. This also applies to the people described below in this paragraph.

The opposite is reporting "in bad faith", in other words knowingly reporting dishonestly, providing incorrect or misleading information, or misusing the procedure for personal grievances or personal gain. Enza Zaden does not permit reporting in bad faith and may take disciplinary measures if this occurs.

Those who assist you in speaking up, the investigators involved, and witnesses heard during the investigation are protected in the same way. The person accused or the subject of the report is also entitled to protection from retaliation until it has been established that they acted culpably.

## Protecting your identity

We handle all reports confidentially. Your name is known only to the person receiving your report, the investigators appointed and the Integrity Committee, unless you provide explicit consent to disclose your identity to others. You can help protect your own identity by being discreet and limiting the number of people with whom you share your concerns.

If you wish to remain completely anonymous, contact the external Enza Zaden SpeakUp! line. Anonymity is permitted in countries with whistleblowing laws that allow it.

Your confidential advisor and our Business Ethics Officer may not disclose your identity to others without your permission, except to the appointed investigator(s). The only exceptions are if:

- this is required by law, or
- you have made a report in bad faith, or
- there is an important public interest at stake, in which case we will inform you accordingly.

In some cases, concealing your identity may hinder the investigations and may even prevent us from taking appropriate action. In such cases, we will ask your permission to reveal your identity. This will only be done with your consent.

## Protection of personal data is assured

Enza Zaden is responsible for processing personal data in the context of this Speak Up! procedure and does so in compliance with privacy laws. This includes processing your name, title/role, email address, and telephone number. The name of the person who is the subject of your report and, if applicable, the names of other people involved (such as witnesses) or confidential advisors are also processed. The personal data we obtain from the Speak Up! procedure are used solely for the purposes explained in this document and are shared only with those who need to know them, in order to comply with the law, or if an important public interest is at stake.

The external provider of the Enza Zaden SpeakUp! Line may only process personal data in accordance with instructions from Enza Zaden. Anyone whose personal data are processed under this Speak Up! procedure can request a full written summary of the details available about them from Enza Zaden at any time and in accordance with the privacy rules. An exception is if this would seriously impede the investigation and the enforcement of rights in the context of statutory procedures.

If any data are found to be incorrect or irrelevant, the person concerned can request their correction or deletion. Responses to requests for access, correction, or deletion will be provided without delay, at least within four (4) weeks. If a request is refused, this will be communicated in writing, stating reasons.

# Reporting to external authorities

We encourage you to report concerns internally through this Speak Up! procedure, but you are also allowed to report them directly to external national or local authorities.

However, the option of reporting externally is only suitable and allowed intended for reporting misconduct (such as a breach or risk of a breach of European Union laws or an act or omission behavior that potentially breaches not only our Business Ethics Code but also legislation or with regard to which public interest is at stake). An external report can have significant consequences for both Enza Zaden and those involved. Furthermore For this reason, Enza Zaden considers it important that, the instrument used for external reporting must be proportionate to the matter in question and used only when and the reporter carefully considers whether there is a potentially less damaging option available alternatives are unavailable. The Enza Zaden requests that any reporter making an external report must keep the potential negative consequences for Enza Zaden, its stakeholders, and the people involved to a minimum.

Before disclosing information to an external authority, we encourage you to inform the confidential advisor, the Business Ethics Officer, the external Speak Up! reporting line, or the Integrity Committee about the report you plan to make.

This Speak Up! procedure does not prevent you from reporting possible violations of laws or rules to external authorities, and no prior permission is required for this. Nevertheless, we strongly encourage you to express your concerns through the Speak Up! procedure and assure you that we will handle them professionally and with due care.

# Contact details and further information

## Confidential advisor

There is at least one designated person available with whom employees can discuss their concerns with regard to our Business Ethics Code. A confidential advisor cannot be dismissed as punishment for their role in dealing with a specific concern. If you need help finding a confidential advisor, please contact HR. You can find the contact details of the confidential advisors on EnzaPlaza.

## Business Ethics Officer

Per email: [speakup@enzazaden.nl](mailto:speakup@enzazaden.nl)

## External Speak Up! line

For each country, there is a local telephone number available for leaving your Speak Up! message. You will find this telephone number and the link to the online SpeakUp Line on EnzaPlaza.

# Miscellaneous

Once a year, the Business Ethics Officer presents a high-level overview of all reports received and their tasks and duties to the Board of Directors and the Audit Committee of the Supervisory Board. These bodies also evaluate the activities of the Integrity Committee.

This Speak Up! procedure was approved by the Board of Directors of Enza Zaden Beheer B.V. on 18 October 2017. It entered into force on 1 April 2018 and was amended on 31 August 2022, 17 July 2024, 20 May 2025 and 25 November 2025. The Works Councils have given their consent where required.

This Speak Up! procedure may be amended and added to by means of a decision of the Board of Directors of Enza Zaden Beheer B.V. The Board of Directors is authorized to make decisions in situations not covered by this Speak Up! procedure. If any provisions of this Speak Up! procedure conflict with mandatory local legislative provisions, the latter will take precedence.

Version January 2026

**Annex 1:** Investigation Protocol

# Annex 1 to the Speak Up! procedure: Investigation protocol

This annex to the Speak Up! Procedure describes how the investigation within the Speak Up! procedure is performed and who is involved in the investigation.

## The start of the investigation – deciding upon follow-up actions and investigators

Once the Business Ethics Officer (BEO) has determined that the report falls under the Business Ethics Code and therefore under the Speak Up! Procedure, the Integrity Committee (IC) will follow up on the report. After an initial assessment, it will decide whether it will conduct the investigation itself, or whether the nature and topic of the report requires it to be conducted by other people internally or an external third party. It will decide upon the next steps and investigators involved with great care.

Any internal investigators appointed by the IC must be impartial, with no prior involvement in the reported situation and no personal or close working relationship with the person(s) under investigation. These appointed people may not be a direct colleague, a manager, or subordinate or the person(s) under investigation. The nature of the report will determine the core areas that should be involved in the investigation (HR, Finance, Legal, etc.).

As a general principle, external investigator(s) should be appointed or involved if:

- a. there is a probability that the investigation will uncover criminal offenses and Enza Zaden wishes to maintain legal privilege in potential discussions with the Public Prosecution Office or subsequent civil or criminal proceedings;
- b. the report concerns members of the Enza Zaden Board of Directors;
- c. the nature of the report requires specific expertise (e.g., forensic accountants or IT security experts);
- d. there are not enough experienced investigators available for the situation reported; and/or
- e. the report concerns a matter that could negatively affect the reputation of the entire Enza Zaden group if it becomes known.

## During the investigation

The IC is responsible for ensuring that all investigations are conducted properly and responsibly, in accordance with the following principles:

- a. The investigation must be conducted fairly, carefully, and with strict objectivity. Conclusions must be made on the sole basis of facts, supported by the collected evidence;
- b. The investigators must act in compliance with Enza Zaden's Business Ethics Code and treat all employees that are directly or indirectly involved in the investigation fairly and with respect;
- c. The investigators should have full access to Enza Zaden records, information, and premises to conduct the investigation, unless any of this is subject to legal restrictions.
- d. The investigation must be conducted in a timely manner (ideally completed within three (3) months);

- e. The investigators must be able to conduct the investigation independently, with the necessary freedom and without fear of retaliation.

The report and investigation are treated as strictly confidential. The confidentiality of information and the people involved should be monitored very closely throughout the procedure.

The IC – if applicable upon request by the investigators – may decide to take certain interim measures during the investigation (such as suspending the accused with or without pay, temporarily transferring the Reporter to another department, securing and making digital information available (by means of an instruction to the Global Manager Enterprise Architecture & Information Security to store and secure e-mails and back-up files ), or using surveillance cameras where necessary and permitted by law).

The investigation is a fact-finding procedure intended to determine whether, and to what extent, the concern, behavior, or situation reported has occurred. This must be supported by evidence. The steps and actions to be taken by the IC or appointed investigators are as follows:

- Interview the reporter;
- Interview the person(s) who are the subject of the report:
  - If a report has been made about a specific individual, they will normally be informed about the suspected misconduct as soon as possible. An exception may be made if such disclosure is expected to seriously hinder the investigation and thus obstruct Enza Zaden's rights in any legal proceedings. The IC will decide on this. If the person concerned cannot be immediately or fully informed, they will be informed (or informed more fully) as soon as the investigation allows.
- Interview other individuals who are involved in some way may possess relevant evidence or information, or may have witnessed the reported situation;
- Maintain a log of all actions taken and interviews conducted;
- Prepare written records of all interviews held during the investigation, and send a draft version or summary to each interviewee for review and confirmation;
- Collect and review all relevant documents, information, emails, and evidence deemed relevant for the investigation. Any evidence gathered may later be used in legal proceedings and must therefore be handled and secured with utmost care;
- Draft an investigation report summarizing the investigation, its findings, and any recommended action. The report must contain only factual descriptions, referrals to the supported evidence, conclusions, and recommendations, without personal impressions or opinions of the investigators.

The BEO will keep the reporter informed during the investigation, ultimately within eight (8) weeks of its start – or sooner, if possible or relevant.

## Closing the investigation

The investigation should be completed by no later than three (3) months after receiving the report. If this is not possible due to specific circumstances, the BEO will inform the reporter accordingly.

The IC receives a written report from the investigators, including a brief summary of the investigation, the factual findings, the views/comments of the involved parties (including the reporter, the subject(s), and any witnesses), the investigators' conclusions, Enza's position regarding the report, and – if applicable – recommended measures to be taken.

The IC may invite the investigators to a meeting for further consultation or clarification of the report. After this – or solely after reviewing the investigation report, if deemed sufficient – the IC will determine the appropriate measures to be taken and the persons to be informed, and issue a binding recommendation to senior management or, if relevant due to the nature of the case, to the Board of Directors. Further details are outlined in the next paragraph.

The IC will also determine who should be informed about the outcome of the investigation, depending on the nature of the report and the findings. If no or insufficient evidence is found, the BEO will inform both the reporter and the subject of the report. The outcome of the investigation will be included in the report register maintained by the BEO. The BEO will notify the reporter of the outcome and formally close the case.

The IC will meet periodically to review reports and, together with the BEO, will oversee the implementation of the concluded measures within the organization.

## Recommendation on measures and further actions

If the investigation concludes that a violation of the Business Ethics Code has occurred, the Integrity Committee issues a binding recommendation to the (senior) management of the relevant department (Board -1 level) or to the Board of Directors, regarding measures to be taken and individuals to be informed. This may include specific disciplinary actions (such as a reprimand, demotion, or dismissal), instructions to improve internal procedures and processes, or both. All actions must comply with applicable local laws.

Once a decision on the measures has been made, they will be discussed by the BEO and/or the VP of HR, along with the relevant manager of the individual subject to the measures. The manager, in coordination with the VP of HR if necessary, is responsible for implementing the disciplinary and corrective measures.

If changes to internal procedures or processes are recommended and approved, the BEO will inform the appropriate department or individual responsible for implementation.

The IC will monitor and regularly check whether these measures have been implemented and followed.

Possible disciplinary actions include, but are not limited to: an official warning, improvement measures, repayment of damages, suspension or withholding of salary, transfer to another position or department, suspension without pay, and dismissal. These measures may be taken regardless of the employee's position or level.

Different factors of the situation are considered when a disciplinary measure is imposed, such as the nature, duration, frequency and extent of the violation, the circumstances under which the violation occurred, whether it is a first violation or if employee has previously violated the Business Ethics Code or committed a wrongdoing, the knowledge and experience (about internal rules, policies and/or procedures) and seniority (exemplary behavior is expected from each manager).

How these factors are weighted depends on the specific situation. The IC will motivate which factors were considered and how they were taken into account in its decision-making process.

2026

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