

# Urenco Speak-out Procedure

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## 1. Purpose

The Urenco Board and Executive Committee believe it is fundamentally important that the Group has a strong speak-out culture. An open and honest speak-out culture is healthy, will create better working relationships internally and allow us to promptly and fairly resolve behaviours that are wrong, illegal or place people at risk. This procedure is intended to support development of the desired speak-out culture based on the following principles:

- speaking-out is essential and Urenco wishes to improve employee's trust in speaking-out;
- anyone who speaks-out can expect their concerns to be dealt with in a timely, fair, sympathetic and effective manner; and
- those who speak-out will be fully protected against any form of retaliation of negative consequences.

This procedure is a key part of Urenco's ongoing culture project and should be read in conjunction with Urenco's Code of Conduct

Urenco is committed to:

- continual improvement of its independent speak-out management system, and is committed to trust, impartiality and protection in its process;
- ensuring that its speak-out procedure is in line with the International Organisation for Standardisation Guidelines 37002 and to meeting the legislative requirements in the jurisdictions it operates in; and
- promoting a speak-out culture in which individuals feel confident and empowered to report concerns and challenge any wrongdoing, poor practices or behaviours.

We expect those who work for Urenco to maintain high standards of ethical behaviour, to conduct business with honesty and integrity and to act in accordance with our Code of Conduct. Each of the individuals holding roles as part of Urenco's speak-out management function, including external reporting lines, have been chosen as suitably independent and authoritative to fulfil their role in upholding these standards.

It is important that employees, contractors, suppliers and any other stakeholders know what to do if, in the course of their work or interaction with Urenco, they come across any Relevant Events (as defined below). The purpose of this procedure is to provide any person wishing to disclose information that relates to Relevant Events at Urenco with a clear framework within which to make an allegation and to ensure that:

- allegations reported are dealt with appropriately;
- people who report Relevant Events;
  - are provided with a clear understanding of how allegations and any subsequent investigation will be handled;
  - are protected from victimisation and retaliation; and
  - are supported throughout the reporting process.
- balanced and procedural fairness is afforded to anyone who is the subject of an allegation; and

- appropriate reporting mechanisms are in place to inform senior management, where appropriate, of allegations made, investigations initiated and actions taken.

This procedure does not cover personal grievances. These are covered under the applicable Resolution at Work or Grievance Policy and will be detailed in your employee handbook (for employees of Urenco Limited and Urenco Enrichment Company (UEC)) or your local HR policies (for employees of UUSA, UI, UD, UNL, UUK, UCP and UNS).

This procedure does not in any way replace local programmes or processes that implement local, state, or national laws, codes, regulations, regulatory requirements or license conditions. **We also recognise that you may also be able to report your concern to an external regulatory body rather than to Urenco.**

## 2. Scope

This procedure applies to Urenco Limited and all wholly owned subsidiaries other than Louisiana Energy Services, LLC (also known as Urenco USA) and applies to all Urenco Personnel other than LES Personnel. LES operates its own Employee Concerns Programme in accordance with NRC requirements.

This procedure is also available to External Parties, including suppliers, customers, members of the public and any other stakeholder and is available on our website [www.urencoco.com](http://www.urencoco.com).

This procedure does not form part of any employee's contract or terms of employment and we may at our discretion amend it or its enforcement it at any time.

## 3. Definitions

**Code of Conduct:** The Code of Conduct is the document which sets out how Urenco expects its employees and third parties operating on Urenco's behalf to conduct themselves.

**Urenco:** Urenco Limited and all wholly owned subsidiaries.

**Urenco Personnel:** All Urenco employees, former employees, job applicants, officers, secondees, consultants, contractors, interns, temporary workers, agency workers, volunteers as well as anyone working under their supervision and direction.

**External Parties:** any external parties working directly or indirectly for Urenco, including customers, members of the public, suppliers and shareholders/other stakeholders, or anyone else who comes into contact with information about Urenco that they might wish to disclose.

**Relevant Event:** Wrongdoing, inappropriate behaviour or conduct that constitutes a breach of the Code of Conduct, or relates to any of the following matters (although this list is not exhaustive):

- a. Criminal activity;
- b. Failure to comply with any legal or professional obligation or regulatory requirements;
- c. Miscarriages of justice;
- d. Wilful breach of health and safety policies and procedures or any danger to health and safety (other than where such events have been reported in accordance with applicable local policies and procedures and have been investigated satisfactorily);
- e. Wilful breach of environmental policies and procedures or any damage to the environment;
- f. Serious breach of the Group's policies and procedures;
- g. The offering or acceptance of a bribe;
- h. Use of Group funds or Group resources in a manner that could reasonably be construed as inappropriate;
- i. Wilful damage or sabotage of company property or assets;
- j. Violent, aggressive or coercive behaviour;
- k. Unwelcome advances, request for sexual favours, and other verbal or physical conduct of a sexual nature may constitute sexual misconduct or harassment;
- l. Illicit use of drug, alcohol or other prohibited substances;
- m. Bullying, discrimination, harassment or abuse (including verbal, physical or online);
- n. Violations of European law on selected topics (e.g. public procurement, protection of the environment, radiation protection etc.) in accordance with Article 2, Paragraph 1 of the Whistleblowing Directive;
- o. Victimisation, recrimination or retaliation against a person(s) who has/have either reported inappropriate ethics, behaviours or conduct or have participated in an investigation; or
- p. Instruction to withhold information or cover up alleged wrongdoing.

## 4. Responsibilities

The General Counsel has overall responsibility for this procedure.

## 5. Procedures

Urenco is committed to having an environment where you can ask questions and raise concerns about Relevant Events without fear of retaliation. If you have experienced or witnessed any Relevant Events in the workplace, you should report them. Do not hesitate to seek guidance on these matters. It is better to ask a question or raise a concern at an early stage than to ignore an issue that could have more serious consequences in the longer term.

### 5.1 Reporting suspected Relevant Events

Urenco is committed to maintaining a culture whereby employees feel empowered to raise concerns about anything that they believe might be a Relevant Event.

All employees have a responsibility to "do the right thing" and if you suspect there has been a Relevant Event you should, in the first instance, talk to your line manager. If you feel uncomfortable doing this then you can approach local site management team members, local HR or compliance functions. If you are uncomfortable discussing issues with local management you can also discuss your concerns directly with any of the individuals listed at Section 5.2 below or another senior manager.

Where you feel unable to raise concerns directly, or do not believe that management has appropriately dealt with your complaint, you may use Urenco's speak-out facility, anonymously if preferred, using the hotlines listed below. Please note that for concerns regarding your own employment, or how you have been treated by your manager, you should use the applicable Resolution at Work or Grievance Policy unless there is a reasonable basis for not doing so.

### 5.2 Urenco Speak-Out Channels

The decision to speak-out about a suspected Relevant Event is often difficult and in order to support employees to make this decision we have partnered with an external organisation, NAVEX Global, to ensure that those who wish to report a suspected Relevant Event can choose a channel that's most comfortable for them. This means that, regardless of their location, circumstances or personal preferences, all Urenco Personnel are able to speak up about any suspected Relevant Events. The current reporting channels available are detailed in the table below.

**Table 1: Reporting Channels:**

**Internal Reporting Lines**

If you wish to report a suspected Relevant Event, you can make a report to:

- your line manager or local HR function;
- the General Counsel, Deputy General Counsel & Head of Legal, Chief People & Culture Officer or the Corporate Compliance Manager; or
- Urenco’s speak-out management function by emailing [speak-out@urencoco.com](mailto:speak-out@urencoco.com)

If you wish your report to be heard and/or investigated locally, please email [speak-out@urencoco.com](mailto:speak-out@urencoco.com) and we provide details of an individual located in your local jurisdiction.

If you are not comfortable to do so, or otherwise do not feel able to report concerns or issues internally, you may make a report via Urenco's external and independent speak-out service provider. People reporting issues or concerns are not required to identify themselves and will not be named in any report to Urenco, unless they have consented to their identity being disclosed. All reports received by the independent speak-out facility are reported to the General Counsel in accordance with this procedure. The speak-out service provider currently offers two channels by which to report concerns or issues:

**1. Speak Out Reporting Line**

The Group's speak-out facility is operated by NAVEX GLOBAL an external and completely independent organisation. This is a free to call and confidential service, supported by professional communication specialists who are available 24 hours a day and 365 days a year to enable you to report your concerns.

You can contact the NAVEX GLOBAL Alert Line (in local language) on the following telephone numbers:

- 0808 196 5836 (UK)
- (833) 604-0803 (USA)
- 0800 1815178 (Germany)
- 0800 0228569 (Netherlands)
- 0800-300-8899 (Japan)
- 800 681 6505 (Mexico)
- 400 120 0140 (China)
- 080-880-2098 (South Korea)
- +1(503) 530-7022 (Global)

### **Speak Out Web Portal**

You can report any concerns in writing via an online using a web portal. The portal is secure, multilingual and compatible with most devices and browsers. The web portal is also operated by NAVEX Global on Urenco's behalf.

The web portal can be accessed via <https://secure.ethicspoint.eu/domain/media/en/gui/106634/index.html>

### **Additional reporting channels in the Netherlands**

In the Netherlands, you can report suspected wrongdoings and breaches of European law outside Urenco to the following authorities:

- The Consumer and Market Authority (ACM) for violations of competition law;
- The Authority for Personal Data Protection (AP) for violations of the General Data Protection Regulation (AVG);
- Authority for Nuclear Safety and Radiation Protection (ANVS) for concerns as to nuclear safety or radiation;
- De Nederlandsche Bank N.V. (DNB) and the Dutch Authority for the Financial Markets (AFM) for violations of financial-economic regulations; or
- The Whistleblower's House may investigate a report of suspected wrongdoing or a violation of European law if no other organisation, such as an inspection or supervisor, is authorised to do so.

### **Additional reporting channels in Germany**

In Germany, you can report suspected wrongdoings and breaches of European law outside Urenco to the following authorities:

- Federal Commissioner for Data Protection and Freedom of Information;
- The Urenco Deutschland GmbH Works Council; or
- the competent State Data Protection Commissioner of the federal state.

### 5.3 Investigation Process

A flowchart explaining the investigation process is contained in the Appendix to this document. This flowchart should be read in conjunction with the more detailed information provided below.

#### ***What happens when an allegation of a Relevant Event is raised?***

Urenco is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally.

Reports will generally be subject to an initial review by the General Counsel, save for where the Person who has reported a Relevant Event has specified that they would prefer their report and investigation to be handled locally (in which case, the initial review shall be conducted by a local individual with input from the General Counsel as necessary). This initial review will consider, among other factors, the nature of the allegations, the completeness of the report, the risk of detriment to the individual who has reported the concern and the level of protection required for that individual (and anyone else involved). The purpose of this review is to ensure that any additional measures or requirements, as mandated by local regulators or legislation, are identified and taken account of in any subsequent investigation.

If the matter concerns allegations relating to nuclear safety, security or regulatory violations, the General Counsel (or other initial reviewer, as applicable) may inform the relevant site Managing Director and Chief Nuclear Officer of any applicable allegations of nuclear safety, security or regulatory violations within two business days.

Having carried out an initial review of the allegation, the General Counsel may determine that an initial 'triage' of the matter should be carried out, in which case the matter may be referred to and discussed in confidence with relevant members of the Urenco Speak-Out Management Function (the **SOMF**).

- The SOMF includes the General Counsel, Deputy General Counsel, Corporate Compliance Manager, Chief People and Culture Officer and the Head of Audit & Risk and can include other relevant Urenco employees.
- Where the person who has reported a Relevant Event has indicated they wish their allegation to be investigated in their local jurisdiction, the individual to whom the report was made shall be responsible (with input from the General Counsel) for liaising with the SOMF.

The General Counsel is responsible for deciding on next steps to deal with each allegation. Usually this will involve making appropriate and discreet internal enquiries first, but it may be necessary to carry out a formal investigation at a later stage, depending on the nature of the concern raised. The General Counsel may determine that the concern reported does not reasonably fall within the definition of a Relevant Event and is more appropriately dealt with via the applicable Resolution at Work or Grievance Policy. However, any decision made in this regard will be reviewed regularly to ensure that any potential Relevant Events that emerge through investigation of the matter are dealt with appropriately.



Anyone who reports a Relevant Event should be informed of the support and protection available to them as soon as their report is made. Further details of the support are contained below at 5.7 and details of how people who report Relevant Events will be protected are explained later in this section.

### ***Who investigates an allegation of a Relevant Event?***

The General Counsel will appoint an impartial designated person to undertake initial enquiries into the alleged Relevant Event (the ***Investigator***). This will typically be someone within Urenco who has experience of investigating complaints, and selected

based on their role, responsibilities and experience. In some cases the General Counsel may determine that it is appropriate to appoint an external person to undertake the investigation. The Investigator may in some instances be based in a location other than the location where the Person who has reported the Relevant Event is based, save for where the reporter has specified that they would prefer their report and investigation to be handled locally (in which case, the Investigator shall be someone in the relevant jurisdiction).

As a first step, the Investigator will usually request a meeting with the person raising the concern. The Investigator will then determine the scope of the investigation required and conduct it accordingly. The Investigator may consult and request all documents within Urenco that they reasonably consider to be necessary to carry out the investigation and may ask the individual for further information about the concern raised, either at the initial meeting or at a later stage.

### ***What protections are in place for confidentiality, and what happens if the person who has reported the Relevant Event wishes to remain anonymous?***

Urenco will make every effort to keep the identity of an individual (including those who assist someone who has reported a Relevant Event in the reporting process, and any affected third parties) confidential if that is their wish. However, there may be circumstances (including, but not limited to, where disclosure is required by law or regulation), where this is not possible. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a Relevant Event disclosure without the help of the individual who raised the concern, so the individual may be asked to come forward as a witness.

Before referring a matter onwards for investigation, the General Counsel will consider whether the identity of the person raising the concern should be withheld from the Investigator. The decision in this regard may be influenced by factors such as: (a) any preference expressed, or instruction given by the relevant individual; (b) the nature of the concern raised; or (c) the need for the Investigator to know the individual's identity in order to carry out a thorough investigation.

In cases of doubt, the General Counsel may contact (or ask the original recipient of the report to contact) the person who has reported the Relevant Event and confirm that they are prepared for their name to be shared on a limited basis for the purpose of the investigation (or subsequent disciplinary action).

Regard will also be had to confidentiality when considering (for example) to what extent notification of senior members of the business, or the line manager of a reporter or subject of a report is appropriate. The starting assumption will be that the identity of a (non-anonymous) person who has reported the Relevant Event should not be shared unless strictly necessary.

In some circumstances concerns will be raised anonymously and the Investigator may therefore have to carry out the investigation on the basis of limited information. Such concerns can be very difficult to investigate. Urenco will consider them at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

The General Counsel will provide guidance to the Investigator on the considerations around contact with the person who has reported the Relevant Event (where that person's identity is known) while the investigation is ongoing.

If a person who has reported a Relevant Event has asked for anonymity but Urenco is then required to share that person's identity for the purposes of an investigation, this will not be done without that person's express written consent.

Although a concern may be made anonymously, Urenco encourages individuals to put their name to their allegation whenever possible. If this is not done, it will be much more difficult for Urenco to protect the individual's position or to give feedback on the outcome of investigations.

Urenco is committed to ensuring the protection and wellbeing of all our staff and, in the event that an individual has knowingly raised a concern frivolously, maliciously, for personal gain or makes an allegation they do not reasonably believe to be true, that individual may be subject to disciplinary action.

### ***What protections are there in place to prevent retaliation?***

Urenco prohibits any form of retaliation against an individual who has raised a concern and will not tolerate any form of retaliation, including harassment or victimisation. Any person involved in conduct that interferes with the ability of any person who has raised a concern to function either professionally or personally may be subject to disciplinary action, which may include dismissal. Any attempts by any Urenco Personnel to identify a person who has reported a Relevant Event will also be treated as a disciplinary matter.

If a person who has reported a Relevant Event believes that they are being subjected to any form of retaliation, they should refer this immediately to either the Chief People & Culture Officer, General Counsel or Deputy General Counsel. Urenco will ensure that such concerns are investigated and appropriate action taken.

All staff should feel able to voice their concerns openly under this procedure.

### ***How long will the investigation take?***

It is often difficult at the beginning of an investigation to assess how much time will be necessary to complete all investigatory steps. E-communication searches may be required. Documentation or other evidence may need to be gathered and reviewed. It may also be necessary to conduct interviews to gather information about the allegation or complaint raised.

Urenco will endeavour to complete investigations and subsequent recommendations within a reasonable time and, where possible and practical, keep the individual who raised the concern or allegations informed of progress.

Urenco aims to have all investigations completed within three (3) months of the initial complaint being lodged and some matters will be completed much more quickly. However in some limited cases – for example, where a matter is particularly complex - it may not be possible to conclude an investigation within three months.

### ***How is the person who has reported a Relevant Event kept updated?***

It is the General Counsel's responsibility to ensure that the person who has reported a Relevant Event is kept updated at appropriate intervals during the investigation.

The General Counsel shall inform each person who has reported a Relevant Event of receipt of the report within two working days, and shall provide feedback as to the next steps within one month from the date the report was made. This maximum timeframe does not, however, compel the General Counsel or the Investigator to complete all investigations within one month.

### ***How will the Investigator report back to the SOMF, people who have raised Relevant Events and any other relevant persons?***

The General Counsel will expect to be kept updated by the Investigator at regular intervals (not less than monthly or, where an investigation is likely to be concluded within one month, not less than weekly) as to the progress of the Investigation.

At the end of the investigation, the Investigator will report back to the General Counsel. The General Counsel will then consider the appropriate degree of feedback to be given to the person who reported the Relevant Event. In many cases it may not be appropriate for details of the investigation outcome to be shared with the person who reported the Relevant Event (for example, because this would entail divulging personal data about another employee, or it contains commercially sensitive information). The General Counsel should consider whether or not this is the case (and if it is considered appropriate to share some information on the outcome, it should do so).

Even if details of the outcome cannot be shared, the Investigator will contact the person who reported the Relevant Event to confirm that the Investigation is complete.

The General Counsel will then:

- a) establish and maintain a record of all reports received, details regarding the investigation process undertaken and details of any actions required or taken to resolve the matter, including ensuring that this record is stored in accordance with Section 5.4;
- b) at the conclusion of the investigation, decide on necessary next steps, including appropriate actions in response to any findings and ensuring support continues to be available and monitored as necessary;
- c) inform the subject of the allegations of the outcome of the investigation, where applicable; and
- d) inform the person who reported the Relevant Event of the outcome of the investigation and, where possible and practical, share details of actions taken or recommendations made.

The General Counsel shall also be responsible for:

- a) Informing the CEO of all significant Relevant Events received, the status of all ongoing investigations and the outputs, decisions and recommendations made on completion of all enquiries or investigations;
- b) Informing the Urenco Audit Committee of all significant Relevant Events reported, the conclusion of enquiries or investigations completed, and maintaining a dialogue with the Audit Committee regarding any feedback or issues identified;
- c) Considering how any outcomes may be used for wider organisational learning objectives, including assessing the effectiveness of Urenco's investigation and triage processes and any concerns or trends identified which may have a wider impact on Urenco's culture; and
- d) Informing Urenco's Executive Committee of all significant Relevant Events and any points identified under c) above.

### ***What protections are there against any retaliation?***

If an individual uses this procedure in good faith to raise a potential Relevant Event, Urenco will treat their concern seriously and act according to this procedure.

Urenco will ensure that individuals who raise concerns in good faith do not suffer any detriment or harm and will not be subject to any form of retaliation, even if allegations are not confirmed or upheld by subsequent investigation.

During the investigation of a potential Relevant Event, the General Counsel will be responsible for actively monitoring the risk of detriment to and/or retaliation against the person who reported the Relevant Event. On identifying any actual or potential risk of detriment or retaliation, steps shall be taken to ensure that this risk is controlled and reduced as much as possible. Such steps may include, but are not limited to, temporary reassignment of work or rearranging of reporting lines.

If an individual considers that they may have been subjected to retaliation for speaking-out, they should contact the General Counsel in the first instance. As above, the General Counsel shall determine what process shall be followed for investigating such matter and in particular shall take such steps as may be reasonably necessary to ensure that the individual is not at risk of detriment or harm. Any form of retaliation, including attempts to identify individuals who have raised Reportable Events, will be treated very seriously and may result in disciplinary action.

#### **5.4 Investigation Documentation**

All documentation created or obtained in connection with investigation of a potential Relevant Event will be stored securely in a restricted access folder including (but not limited to) records of any interviews held, reports, the scope of the investigation conducted and the decisions taken. This information will be processed and stored in line with the Urenco Group Data Protection Policy (see below at 5.8).

#### **5.5 If you are not satisfied with an outcome**

If you are not happy with the way in which your concern has been handled, please contact the General Counsel. The General Counsel will perform an initial assessment regarding how concerns or issues raised have been dealt and, if necessary, appoint a suitable and impartial individual to conduct a more detailed review. Any complaints shall receive a response within 30 days (unless it is determined that additional time is needed, in which case this will be communicated to you) and the outcome of any assessment or review shall be communicated on a timely basis.

#### **5.6 External Disclosures**

The aim of this procedure is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances and jurisdictions it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media or the public directly and we strongly encourage you to seek advice and report your concerns using this procedure or to an appropriate external party before doing so. A number of potentially relevant authorities are noted above at 5.2.

Speak-out concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first in accordance with this procedure.

## 5.7 Support

Urenco appreciates that being involved in a speak-out process can be stressful and has therefore made support available free of charge via your local employee assistance programme. This support is available throughout your involvement in the speak-out process.

Anyone wishing to find out more about speaking-out, the options available for reporting wrongdoing or any other related matter can seek confidential, free and independent advice from the applicable employee assistance programme, details of which can be provided by your local HR team.

## 5.8 Personal Data

Whilst investigating speak-out concerns, it is inevitable that Urenco will collect personal data. Urenco recognises that the correct and lawful treatment of personal data will maintain confidence in an individual raising speak-out concerns (and any other affected third parties).

The applicable Urenco data protection policy will be provided upon request to anyone making a report to provide information on how their data will be processed in connection with any investigation. All employees should also have regard to the Urenco Group Data Protection Policy which sets out how Urenco handles the personal data of its employees, workers, clients, suppliers and other third parties.

## 5.9 Queries

Please contact the General Counsel or email [speak-out@urenc.com](mailto:speak-out@urenc.com) with any questions regarding this procedure.

## 5.10 Review of this procedure

This procedure shall be reviewed by Executive Committee to ensure continual improvement of its content and the operation of Urenco's processes on an annual basis, and approved annually by the Audit Committee to ensure consistent monitoring of the performance of Urenco's processes.

## Appendix

### Speak-Out Investigation Procedure

#### Initial triage

Allegations of Relevant Events will be subject to an initial review by the General Counsel, (unless the person reporting the Relevant Event has requested that it is reviewed locally\*). If the General Counsel considers that a triage of the matter is necessary, the matter may be discussed with relevant members of the SOMF. The General Counsel is then responsible for deciding on an appropriate response and instigating any course of action required.

#### Appointment of the Investigator

The General Counsel appoints an independent and impartial Investigator to complete the initial queries. This will usually include a meeting with the person raising the concern. The Investigator will determine the scope of the investigation and then conduct it accordingly.

#### Disclosure of the identity

The General Counsel will consider whether the identity of the person raising the concern should be withheld from the Investigator and have regard to confidentiality when considering (for example) to what extent notification of other individuals within the business is appropriate. The starting assumption will be that the identity of a person reporting a Relevant Event should not be shared unless strictly necessary.

#### Making contact with the people who report Relevant Events

The Investigator and/or the General Counsel may:

- Hold an initial meeting with the person reporting a Relevant Event to better understand their concern;
- Consult and request the documents within Urenco considered pertinent for the investigation; and
  - Ask for any further information that is required.

#### Investigation

We will endeavour to complete the investigation in a reasonable time and, as much as possible, keep the person who reported the Relevant Event informed of the process.

#### Reporting back to the person who reported the Relevant Event

The General Counsel shall:

- Inform the person who reported the Relevant Event of receipt of the report within two working days of receipt; and
- Provide feedback as to the next steps within one month from the date the report was made.

Urenco aims to have all investigations completed within three (3) months. This does not compel Urenco to complete all investigations within three (3) months. The timing of completion of each investigation will depend on the nature and complexity of the concerns raised and the type and scope of investigation steps required. The General Counsel will consider whether it would be appropriate to give a brief high-level update on the expected timing for concluding the investigation to the person who reported the Relevant Event.

The General Counsel will inform the subject of the allegations and the person who reported the Relevant Event of the outcome, with other information as appropriate.

#### Reporting back to the General Counsel and other relevant persons

The General Counsel will expect to be kept updated by the Investigator as to the progress of the investigation (with updates being given at least **monthly** or, for shorter investigations, **weekly**).

The General Counsel will update relevant people, such as the Audit Committee and the CEO, and maintain relevant reports.

### **Appeal process**

The General Counsel will assess any potential appeals (responding to complaints within 30 days) and, if necessary, appoint a suitable and independent third party to conduct a more detailed review.

### **Retaliation monitoring**

Any individual should contact the General Counsel if they feel that they have suffered retaliation for speaking-out. The General Counsel is responsible for actively monitoring this risk and shall take steps as reasonably necessary to contain the problem.

### **Record keeping**

All documentation created (or obtained) in relation to the investigation will be stored securely, and will be processed in line with the Urenco Group Data Protection Policy.