

JERA Nex bp

Speak Up Policy

Use and Interpretation of this document

This document may contain confidential / proprietary information. The Code of Conduct requires you to protect that information. Refer to the relevant policy on protecting information for more details.

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This document applies only if it is consistent with applicable legal and regulatory requirements. If you are within JERA Nex bp and you identify an apparent conflict with those requirements consult Legal.

This document has been approved for JERA Nex bp purposes only and not to describe or establish an industry standard or practice. Any recommendations or guidance are to help users to consider and evaluate potential options.

The authoritative, English version of this document is held online as part of the Management System. It takes precedence over any prior version and any non-English version.

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Introduction

JERA Nex bp is committed to conducting our business with honesty and integrity, complying with all applicable laws and regulations governing our operations. We promote a culture of openness and encourage employees to raise concerns and are comfortable doing so without fear of retaliation.

By ensuring that all concerns are addressed appropriately, we create a better workplace and reinforce our dedication to transparency and accountability.

Purpose

This document outlines the speak up policy of JERA Nex bp. This Policy governs the management of all concerns raised through the Speak Up channels outlined in this policy, including the [\[Speak Up Portal\]](#), including concerns that relate to potential violations of laws, regulations, JERA Nex bp's Code of Conduct.

Scope and Exclusions

In scope

This policy applies to all employees including secondees, officers, and any persons working under the supervision and direction of contractors, subcontractors and suppliers as well as members of the Board, across all wholly owned Group entities, all business operations and all geographies, regardless of their location or role. We refer to these as “Employees” in this Policy.

JERA Nex bp complies with all law and regulations in the jurisdictions where we operate. Our guiding principle is to adhere to the highest requirements, meaning that if local laws and regulations are more stringent than the requirements outlined in this policy, the stricter requirement must be observed.

Exclusions

Joint ventures will have their own, separate policies.

Terms and Definitions

1. **May** means an option that is neither mandatory nor specifically recommended.
2. **Should** means that conformance is not mandatory but is preferred.
3. **Shall** means a mandatory requirement.
4. A reference to an **Employee** shall have the meaning described in the Scope section above.

Requirements

When to speak up

This policy can be used to raise concerns about any actual or suspected misconduct within our company. This includes behaviour, action or omission that violates our Code of Conduct, ethical standards, laws and regulations, policies or practices established by JERA Nex bp.

This can encompass a wide range of activities, including but not limited to:

- Conflicts of Interest
- Illegal activity or failure to comply with laws and regulations
- Unethical behaviour that may cause harm or is prohibited by our Code of Conduct and policies, including bribery and corruption
- Fraudulent activity and financial irregularities
- Harassment and any form of unwanted or inappropriate behaviour
- Discrimination and treating individuals unfairly based on race, gender, age, religion, or other protected characteristics
- Disregard for individuals' health and safety, or HSSE regulations and policies

It is not necessary to be certain that a violation has occurred, raising a concern based on good faith that something improper has occurred is sufficient.

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JERA Nex bp does not tolerate any form of retaliation against those who speak up. All concerns will be treated confidentially, and reports can be made anonymously.

How to raise a Concern

There are different channels within JERA Nex bp that you can use to seek guidance and raise any concerns. You can choose to speak to someone about a potential concern in person, remotely by phone (where available) or virtual meeting, or in writing. Our available channels include:

- Your line manager
- Human Resources
- The Legal Department
- The Compliance Department
- The Health and Safety Representative
- The JERA Nex bp [\[Speak up Portal\]](#)

The Speak up portal is an external and independent service. It is accessible 24/7 by [\[web\]](#) or phone (where available). You can speak up confidentially and even anonymously, if you prefer.

We strongly encourage you to raise any concerns internally through one of the channels we have listed above.

What should be included in a report

When submitting a report, we ask that you provide sufficient details to help us understand the allegations and for when we potentially conduct a thorough investigation. This may, for instance, include:

- The background, history and reason of the concern
- Names, dates, places and other relevant facts
- Any documentation that may support the raised concern
- If you know them – details of any laws or company policies may have been violated

Please remember that as a reporter, you should not attempt to investigate the matter yourself, as it can inadvertently compromise the integrity of the process or tip off potential wrongdoers.

What happens after a report is made

All reported concerns, whether made openly or anonymously, will be managed with impartiality, confidentiality, and diligence. Upon the submission of a report, relevant roles and departments will be notified and will convene to determine whether to handle the concern through management action or an investigation is warranted and to outline any subsequent steps.

If deemed appropriate, the report may be referred to a specific department or qualified individual within the company, ensuring there is no conflict of interest, to conduct the investigation. The investigation team will acknowledge receipt of the report and inform the reporter, within seven days, that an investigation has commenced.

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We expect everyone to fully cooperate with and participate in the investigation by making themselves available for interviews, providing requested documents, and complying with reasonable requests from investigators. Honesty and transparency are paramount, and we expect everyone to be truthful in all interactions throughout the investigation process.

As a general guideline, investigations should typically be completed within three months. The specific timeline for investigations depends on the nature of the concern raised and, in some cases, may take longer.

Once the investigation is complete, the relevant person will notify the reporter of the conclusion and any appropriate actions taken, subject to legal and confidentiality constraints. For investigations that conclude with substantiated allegations, management will take necessary remedial actions to mitigate the risk of recurrence.

If you are dissatisfied with the handling of your concern, we encourage you to raise your concerns with the relevant persons or departments.

Ensuring anonymity and or confidentiality

We encourage you to share any concerns or suspicions of wrongdoing with the relevant JERA Nex bp stakeholders as outlined in this policy. If you prefer not to submit a report in person, you can raise your concerns through an independent party using the [\[Speak Up Portal\]](#). While we encourage reporters to provide their name and contact details if they feel comfortable doing so, we understand that this may not always be feasible. Therefore, you have the option to submit your reports completely anonymously, without disclosing your name or contact information.

All reports will be taken seriously and assessed, regardless of anonymity, considering that sufficient information is provided to facilitate an effective review of the allegations. Reports will only be shared with individuals directly involved in the Speak Up process (such as those responsible for triaging and investigating) or those requiring oversight. Each report will be treated with the highest level of care to ensure the confidentiality of the reporter is maintained. Additionally, all reports will be managed in compliance with applicable data protection laws and local laws and regulations.

How we protect against retaliation

At JERA Nex bp, we are committed to fostering a safe and supportive environment where all employees can speak up without fear of retaliation. We strictly prohibit retaliation against anyone for raising a concern or participating in a speak up related investigation. We will not tolerate retaliation in any form and are committed to protecting reporters and any other individuals from suffering detrimental treatment as a result of speaking up. All concerns and related parties are kept strictly confidential, with details released only on a “need to know” basis. Examples of retaliation include, but are not limited to:

- Dismissal or changes to responsibilities that disadvantage the individual
- Harassment or any form of harm or injury, including psychological harm
- Any form of damage to the individual or their property

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We are committed to protecting those who speak up in good faith. We recognise that while most individuals will act with integrity, any reports raised maliciously or in bad faith undermine this commitment and this will be treated as a breach of JERA Nex bp's Code of Conduct.

If you experience any form of retaliation for speaking up, we encourage you to raise concerns through the most appropriate method outlined in this policy as soon as possible, such as with your line manager or through the [\[Speak Up Portal\]](#). All reports of retaliation will be taken seriously and fully reviewed. We consider acts of retaliation to be misconduct and appropriate actions will be taken.

Governance and oversight

This policy is owned by the SVP Legal and will be reviewed periodically to ensure alignment with legal requirements and leading practices. The Compliance Officer is responsible for overseeing the implementation and effectiveness of the Speak up policy, ensuring concerns are recorded and investigated appropriately in accordance with local laws and regulations.

Translation of this policy or the creation of a local policy shall be undertaken in consultation with Legal and Compliance.

Monitoring

The Compliance Department regularly monitors and reviews trends and data raised through our speak up channels to identify systemic risks and ensure ongoing improvements in our culture of integrity.