



JDE PEET'S

PUBLIC ADVOCACY POLICY

[30th June 2022]

INTRODUCTION

In order to fully unleash the possibilities of coffee and tea, JDE Peet's engages with third parties who can positively influence the environment in which the Company operates, and our corporate and brand reputations. An important part of this process is JDE Peet's engagement with public authorities/officials. Ethical, transparent, constructive and legally compliant engagement is a vital part of the policy decision-making process.

PURPOSE

The purpose of this policy (**Policy**) is to ensure: (a) that all interactions by or on behalf of the Company with public authorities/officials are conducted in compliance with all applicable laws and regulations (including but not limited to all applicable lobbying regulations), and are conducted transparently and professionally, (b) that relevant Company employees and duly authorized representatives authorized to conduct lobbying activities have a clear understanding of what transparent and responsible lobbying is and (c) only Company employees who have received approval from their line manager and the Director Corporate & Compliance (DOCC), and third parties authorised in accordance with this policy, engage in any lobbying activity." .

As used on this policy, the terms:

- **Company** refers to JDE Peet's NV and all of its subsidiaries and associated companies; and
- **public authority/official** means any person or authority holding a legislative, executive, administrative or judicial office, whether appointed or elected; any person or authority exercising a public function, including for a public agency or a publicly-owned enterprise; and any official or agent of a public international organization.

POLICY SCOPE

This Policy shall apply to all interactions by or on behalf of the Company with public authorities/officials in relation to public policy development and implementation, including engagements with public authorities/officials in the context of lobbying. The term "**lobbying**" generally refers to oral or written communications with a public authority/official to influence legislation, policy or administrative decisions and includes any activity where an attempt is made to influence the public decision-making processes. Examples of lobbying include, but are not limited to: a lobbyist advocating to influence political decisions on behalf of the Company; discussions with government representatives to influence their decisions for the benefit of the Company; and attempts to influence legislation by negotiating the details of the regulations for the benefit of the Company.

Some countries have established laws on lobbying, the definition of which may vary per country. The DOCC will provide appropriate guidance on the definition of "lobbying" and applicable laws prior to the engagement in any activities by or on behalf of the Company which constitute or potentially constitute "lobbying."



For the avoidance of doubt, this Policy does not apply to (1) the Company's interactions with trade associations or (2) lobbying activities undertaken by trade associations which are not controlled by the Company.

Compliance with this Policy is mandatory for all Company employees and third parties acting on behalf of the Company. In case of doubt, Company employees and third parties should seek guidance from the DOCC.

POLICY

Company employees must receive approval from their line manager and the DOCC before engaging in any lobbying and external representation. The engagement of a consultant or other third party acting on behalf of the Company in connection with lobbying activities requires the approval of the DOCC. If you have any doubt as to whether your proposed activities constitute lobbying or are otherwise covered by the Policy, please consult the DOCC.

Any direct or indirect engagement with public authorities/officials in relation to public policy development and implementation, including engagements with public authorities/officials in the context of lobbying, must comply with all applicable laws and regulations, the [Code of Conduct](#) and other relevant Company policies.

When interacting with public authorities/officials, Company employees (and any third acting on behalf of the Company) must at all times act with integrity and honesty and be transparent and accurate about the purpose of the interaction. In situations not governed by specific laws or internal rules, employees (and any third acting on behalf of the Company) shall use good judgement and common sense, always guided by the Code of Conduct and the principles set out in this Policy and, in case of doubt, seek advice and direction from their line manager or the DOCC. Company employees must, before establishing formal or informal representation to public authorities/officials on behalf of the Company, disclose their identity and relationship with the Company and the purpose of the representation. Neither Company employees nor any third party acting on behalf of the Company must ever, directly or indirectly or through intermediaries, offer or promise any financial or other advantage to public authorities/officials for the purpose of obtaining information or influencing their decision-making. Moreover, employees and third parties acting on behalf of the Company must refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof or other impropriety.

If employing former public officials, measures must be taken to fully understand and comply with the rules and regulations laid down by the relevant government or institution and in line with established best practices, in particular with regards to confidentiality and potential conflicts of interest. Company employees acting as a formal representative to public authorities/officials on behalf of an industry or trade association or industry alliance, must be open and transparent about the nature of the organisation, its position or standpoint and the organisation's connection with the Company. At all such times, the Company employee must only approach public authorities/officials on a topic with a clear mandate from the industry organisation.

Company employees must respect and honour the intellectual property of third parties and must protect Company information that is confidential and/or proprietary, and not divulge such information to other third parties. Under exceptional circumstances and for very specific and limited purposes, Company information that is confidential may be disclosed after prior consultation with and approval of the DOCC and the Line Manager.

A written agreement approved by the DOCC is required whenever the Company contracts a third party to undertake lobbying activities on its behalf. As part of its internal controls against improper influence, all business transactions and financial flows must be properly recorded, classified and documented. This includes any services paid to third parties acting on behalf of the Company for the purpose of assessing and/or influencing public policy development and implementation directed at policymakers or other public authorities/officials and participants in the policy decision-making processes.

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