

Darling Ingredients Inc.

Speak Up Line & Retaliation Policy

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Created by: Compliance Department

Purpose

Many countries have their own laws and regulations around whistleblowers and reporting. This Policy is intended to cover applicable laws to Darling Ingredients Inc. and its subsidiaries (collectively “Darling”), its employees, and its third parties. This Policy explains the reporting options, protections, and processing of any report given through the Speak Up Line, Darling’s employee and third-party hotline service.

Who does this affect?

This Policy covers the worldwide operations of Darling Ingredients Inc. and applies to all Darling employees and its third parties, as identified in this Policy.

Introduction

Darling Ingredients Inc. and its subsidiaries operates and does business in numerous countries around the world with thousands of employees and third parties. Darling is committed to conducting business with integrity and transparency and maintaining an open culture with the highest standards of honesty and accountability where job-related issues, concerns, and violations of policies or laws can be reported and maintained with confidence.

We can often prevent misconduct by taking action early and speaking up if you have knowledge about something improper or someone behaving improperly. If something has already happened that violates our Code of Conduct, company policies, or a law or regulation, it needs to be reported and addressed. Throughout its operations, Darling promotes an “open door” culture and encourages its employees and third parties to utilize internal reporting procedures. Ignoring problems or not reporting them could make matters worse and can damage the trust we build with each other, our customers, third parties, and our shareholders.

Darling recognizes that reporting certain issues or situations to a manager or primary contact is not always possible. For those situations, reporting on the Speak Up Line is encouraged. The Speak Up Line is Darling’s hotline service that is managed by Ethico, an independent, third-party provider, and is available 24/7, 365 days a year with translation and interpretation support.

Each report is taken seriously kept confidentially, anonymity preserved when submitted anonymously, and will be given the proper attention and investigation it deserves. Reports are routed to the appropriate Darling employees to investigate and provide communication back to the reporter until the case is closed. After closure, follow-up questions are sent to the reporter to ask if any retaliation has been experienced. Darling does not tolerate any form of retaliation for making a report in good faith, and any instances of retaliation are encouraged to be reported.

Policy

1. Who can Report

The Speak Up Line is provided so that Darling employees may report any suspected or known violations of law or policy. The Speak Up Line is not intended for normal customer service complaints. Those issues should be reported to Darling's local customer service center/ representative, as applicable. The Speak Up Line is designed specifically for whistleblowers and their protected categories. However, if you are not getting a response or do not believe a resolution was appropriate for a customer service issue, please then make a report on the Speak Up Line.

Additionally, for EU Member States, potential, current, and past employees, third parties, colleagues and partners of employees, and those affected by a report may also report ("third parties") on certain topics. See the [Speak Up Line](#) site for the specific categories available for EU Member States.

2. Reporting Options

Depending on the jurisdiction, employees and third parties may choose to report anonymously or self-identify. If reports are made via email or the Speak Up Line website or phone number; reporters may choose to remain anonymous and can still be contacted via the online portal or by calling in for updates and communications. Employees and third parties can make reports in the following ways:

- In person or direct phone call to Human Resources, Legal, or Compliance department personnel
- Online at the [Speak Up Line](#) website which can be found on Darling Connect, [Darling's public site](#), or by scanning the QR Code that can be found on your local poster
- Phone call to the Speak Up Line (numbers by country are included, see the online list for your local number)
- Email to the Compliance Inbox at compliance@darlingii.com
- Mail to the Compliance Department at the corporate office location: 5601 N. MacArthur Blvd., Irving, Texas, USA 75038

EU Member State employees and third parties only: Reporters may also make a report externally either to their local regulatory office or local media outlet. There is no requirement to report internally before making a report externally. However, Darling encourages internal reporting measures to be used first when possible so that we may remediate issues directly and more efficiently.

Reports made via the Speak Up Line, whether by online submission or phone call, can be made in multiple languages, including our standard eight languages: English, French, Spanish, Chinese, German, Polish, Portuguese, and Dutch.

3. Report Categories

The Speak Up Line is intended for those reports that are violations under company policy, law or regulation, or when you have raised an issue and you do not believe it has been handled properly or completely.

When making a report via the Speak Up Line, the reporter will have the option to select the issue they feel is most relevant to their situation. Upon review of the allegation, the investigation or Compliance team may adjust

the reported category to a more accurate category. The full list of issue types and their descriptions are listed online, please go to the Speak Up Line to view the full list and descriptions.

4. Confidentiality & Anonymous Reports

When making a report, the reporter may choose to do so anonymously. If reporting via the Speak Up Line, whether by phone or internet submission, there are two choices for identification:

1. Voluntarily identifying yourself
2. Remaining completely anonymous

Regardless of how a report is made, if the reporter chooses to remain anonymous, Darling will preserve the reporter's anonymity throughout the investigation process, even if their identity is discovered during the investigation, unless legally required to disclose to a government authority. This means the reporter will not be named in any communication or documentation to those outside of the investigation team or Compliance Department, who manages the Speak Up Line platform.

If a report is made in person or via direct phone call to Darling personnel, there will not be a way to preserve anonymity to the receiving party, however, the reporter can still request their identity remain anonymous to the rest of the investigation team.

Additionally, all reports will be kept confidential. This means that only those with a "need to know," in order to investigate the report allegations, will be told the details of the report. Darling acknowledges that it can be difficult to maintain confidentiality within small groups or departments. Please know that Darling and its investigators will take precautions to maintain confidentiality and anonymity while investigating and remediating any report allegations.

5. Processing of Reports

All Speak Up Line reports will be communicated to the Compliance Department for tracking and overall management. All reports may utilize Darling global resources and investigation support when necessary. Depending on how a report is received, it will go through one of the following processes:

1. Mail or Compliance Inbox – the report will be entered into the online case management system and routed to the appropriate party to investigate. Communications will be made back to the reporter as provided and able.
2. Speak Up Line via website submission or phone call – the report is placed into the online case management routing and will be automatically routed to the appropriate party to investigate. Each case is given its own access number that reporters can follow up on.
 - Online report – reporter can correspond with investigators via the follow up portal, call in for updates, or provide an email to receive updates and communication
 - Call in – reporter can correspond with investigators by calling in for updates or provide an email to receive updates
3. In person or direct phone call to an internal Darling employee – the person and department will handle the investigation according to their procedures. Discuss with the person you are reporting to how updates and communications will be handled.

6. Follow-Up Communications

The person that submitted the complaint through the Speak Up Line or via email can communicate electronically with investigators to give additional information, ask questions, and otherwise communicate with the investigators all while preserving their anonymity. If by mail, updates will be sent to the contact information provided. If a report is made in-person or via direct phone call, please discuss how communications and follow-ups will take place.

Regardless how reports are received, reports will be handled according to these procedures, unless no contact information is provided:

- Once a report is received, a response acknowledging receipt will be given back to the reporter within 2 business days.
- Investigators will provide periodic updates on case status to the reporter while the case remains open.
- All reports will have a resolution within 3 months of receipt, except for cases that may require more time.
- Compliance will monitor all reports to ensure reports are being addressed according to our policies and procedures.
- After a case has been closed, the reporter may receive a questionnaire or follow up questions about any potential retaliation experienced in response to filing a report.

EU Member State employees and third-party reporters only: The reporter has the right to review, edit, and approve their initial report and interview notes. Note: this is only the interview with the reporter, no other investigation or the overall investigation notes are covered under this right.

Retaliation Policy

The Speak Up Line is provided so that employees and third parties may make reports anonymously and independent of Darling. Those reports are then sent to the appropriate Darling team member to investigate while keeping the anonymity and confidentiality of the report to the furthest extent possible. In some situations, where the report generates from a certain location or department or depending on the nature of the allegation, the identity of the reporter or involved parties could be identified. To protect both the reporter, involved parties, or anyone providing information, Darling has implemented a non-retaliation policy.

Darling does not tolerate any form of retaliation against a reporter for making a report in good faith or toward other individuals who are named or provide information about the allegations under investigation. Retaliation can take many forms including, but not limited to the threat or attempt in the form of:

- Suspension, lay-off, dismissal, non-renewal, termination or cancellation of employment, contracts, permits, and/or licenses
- Demotion or withholding of promotion, negative performance assessment or references
- Transfer of duties, withholding of training, change of location of place of work, reduction in wages or change in working hours
- Imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty, and psychiatric or medical referrals
- Discrimination, disadvantageous or unfair treatment, coercion, intimidation, harassment, or ostracism

- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income
- Blacklisting based on a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry

If a person suffers retaliation from making a report, being named in a report, or providing information for an investigation, they can contact the Compliance Department directly or make a report on the Speak Up Line immediately.

In order to protect reporters against retaliation, Darling includes this Policy in its Code of Conduct and online training. Speak Up Line investigators are trained on how to prevent and identify retaliation while completing their investigation. Additionally, after a report has closed, the Compliance Department will send out a survey when the case is closed and then three months after the closure of report. Responses will be analyzed and communicated to appropriate parties to investigate if red flags are identified.

Training & Awareness

Employees will receive targeted, periodic training on Darling's Speak Up Line and Retaliation Policy. The Compliance Department will identify and coordinate the training and awareness methods, which may include email notification, online training, posters in Darling locations, webpage content, formal investigation training, meetings, etc., with the applicable parties.

Data Privacy & Record Retention

Speak Up Line reports and documentation will be kept according to the Company's privacy and retention policies.

Questions About the Policy

If you have any questions relating to this Policy, please contact Chris King, SVP and Chief Compliance Officer at:

Darling Ingredients Inc.
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