

NON-RETALIATION

POLICY



ROQUETTE

Offering the best of nature™

*At Roquette, we are committed to improving the lives
of people around the world and this engagement
starts with integrity. This is how we became a world
leader. That's who we are.*

Thierry Fournier, CEO

This Non-Retaliation Policy establishes that retaliation for speaking up, whatever the channel, is prohibited. It also explains how Roquette addresses allegations of retaliation and how it protects those who raise allegations

This Policy reflects Roquette's commitment to respect the human rights of employees and third-party stakeholders to be free from retaliation for speaking up, as established in our Code of Conduct.

We express our four values in everything we do. Our culture is based on the following: **Authenticity, Excellence, Forward-looking, Well-being.**

Each of us, regardless of our job, role, or location, is expected to act ethically and abide by the laws and regulations applicable to Roquette.

Our Code of Conduct is a guide to help us deal with most situations in our professional lives that could raise ethical issues.

Anyone who witnesses inappropriate conduct, inappropriate behavior, is encouraged to report it.

This is essential to maintain trust with our colleagues and partners.

As stated in our Code of Conduct, we strictly prohibit any form of retaliation against anyone who speaks up in good faith or cooperates in an investigation. The principles and rules set forth in this Policy apply to all Roquette's entities worldwide as well as any third parties acting for Roquette.

Any act of retaliation may constitute a violation of our Code of Conduct and lead to disciplinary and/or legal actions.

WHAT IS RETALIATION?

Retaliation is any adverse action taken against a person as a result of his/her report. It can come in many different forms, such as physical, psychological, or economic retaliation.

Here are some examples illustrating what retaliation could entail:

- Aggressive and threatening behavior, bullying or shaming in front of others;
- Repeated intimidation or humiliation, derogatory or insulting remarks, harassment or social isolation which may occur indirectly or directly;
- Suspension, demotion or termination, unfair performance evaluation, downgrading, modifications of employments terms as a punishment (transfer of duties, change of workplace location, reduction in salary, alteration of working hours...);
- Physical threats and/or destruction of personal property.

While the previous examples highlighted retaliatory actions against employees, retaliation can extend to others who speak up, including business partners and other external stakeholders who may be the victims of damage to their reputation, early termination of contract, or blacklisting.

WHO IS PROTECTED AGAINST RETALIATION?

Retaliation against anyone who, in good faith, may constitute a serious breach of Roquette's Code of Conduct and will not be tolerated.

This protection may apply to anyone (whether employed by Roquette or not), who engages in the following activities in good faith:

- Speaking up or raising concerns about potential or actual violations of Roquette's Code of Conduct or applicable policies, applicable laws and regulations;
- Seeking guidance on whether to report potential or actual misconducts;
- Helping, supporting, or encouraging another person to report concerns in good faith;
- Cooperating with an internal investigation on potential or actual misconduct by providing information, documents, or participating in interviews;
- Refusing to engage in unlawful or unethical conduct.
- These protections ensure that employees and third parties can act in

Roquette's and public interest without fear of retaliation.

Protection under this Policy may not apply to an anonymous report until the identity of the reporting individual is disclosed, as safeguards cannot be provided without knowing who submitted the report. In addition, if a retaliation claim is proven to be knowingly false after investigation and/or made in bad faith, appropriate disciplinary actions and legal measures may be taken.

HOW DOES ROQUETTE HANDLE YOUR ALLEGATION OF RETALIATION?

If a person believes they have experienced retaliation for raising a concern, or have witnessed retaliation against another colleague, it should be reported promptly. Such reports can be made through the same channels as other workplace concerns, including:

- Managers;
- Human Resources Department;
- Anonymous and confidential online reporting Speak Up alert line (available [here](#));
- Compliance Officer (compliance@roquette.com);
- Internal Audit & Risk Management Department.

All allegations of retaliation will be treated seriously and investigated promptly. Reports are assessed and handled according to Roquette's Alert Management and Speak Up Directive.

Where an investigation confirms that acts of retaliation have occurred, Roquette will take appropriate disciplinary and/or corrective measures in line with applicable local laws. Depending on the gravity of misconduct, these measures may include formal warnings, suspension, demotion, or, in the most serious cases, termination of employment. When relevant, the termination of a business relationship or the initiation of civil or criminal proceedings before competent authorities may also be considered.

In addition, regular follow-ups and safety check-ins may be conducted after the resolution of each case to ensure the well-being of individuals who have raised concerns of retaliation and to verify that no retaliatory actions have occurred. When appropriate, Roquette will continue to monitor the situation for a reasonable period, remaining attentive to any subsequent signs of retaliation or adverse treatment.

Roquette is committed to ensuring that all employees feel safe in reporting retaliation, and each situation will be assessed individually, ensuring a fair and proportionate response tailored to each case.

POLICY REVIEW AND EVOLUTION

This current Policy is effective **December 2025**.

All Roquette employees, especially managers and those in leadership positions, must be familiar with the Policy and ensure its implementation.

The most current version of this Policy will always be available on OneDoc, on the page dedicated to SpeakUp on ONE and through the Human Resources Department.

This Policy will be communicated throughout the Group to ensure awareness and understanding.

CONTACT INFORMATION

For questions or further information regarding this Policy, please contact your HR business partner.

