

Regulation applicable to the procedure for reporting and investigation of complaints in relation of Business Ethics and Compliance

This Regulation constitutes, in Portugal, an annex to the Nestlé Group's Code of Business Conduct.





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1. Preamble

1.1. Introduction

In its business, the Nestlé group is governed not only by the legislation in force, but also by the so-called Corporate Principles of Nestlé, approved by the Board of Nestlé S.A., the mother company of the Nestlé Group. These principles are addressed to all Nestlé employees, and they are expected to use them as a guide in their professional activities.

These principles are based on high standards of compliance with existing law, respect for human and labor rights, health and safety at work, quality and safety of products, protection of consumer rights and respect for the environment.

In order to implement Corporate Principles, especially regarding to the maximum respect for law, Nestlé has published the Business Code of Conduct, which articulates the minimum tariffs and obligations that each Nestlé employee is bound to comply with in this matter.

The Code of Business Conduct also regulated the consequences of non-compliance with its provisions (Article 13) and the way in which such non-compliance can be reported internally by the concerned employees to the persons responsible for the Company: basically, the hierarchical superiors of their respective collaborators (People Managers and Business or Enterprise Directors) and the Human Resources, Legal Services or Compliance (Article 14).

Thus, the Code of Business Conduct provides the possibility that communications of such irregular conduct may be carried out by means of employee-specific service lines which, where deemed appropriate, complement the other ways of performing the internal non-compliance reports referred to above. To this end, the Nestlé group has implemented **SPEAK UP**, a global internal and external channel of complaints through which Collaborators, Customers, Suppliers, and other third parties can make their complaints about Business Ethics and Compliance.

1.2. Purpose of the Regulation

This Regulation lays down the procedure for the communication of acts contrary to the Business Code or to the existing legislation, whether by **SPEAK UP** or other channel, by the employees¹ of the Nestlé Group in Portugal² and other third parties such as customers, suppliers and other trading partners.

¹ For the purposes of thi Regulation, "**Collaborators**" means all employees and any other natural persons providing Services to the Nestlé Group, no matter the type of contractual relationship between them and the Nestlé Group, including administrators, managers and trainees.

² The **Nestlé Group in Portugal** concerns the following companies: Nestlé Portugal, *Unipessoal*, Lda., Nestlé Business Services Lisbon, S.A. and Cereal Associados de Portugal, A.E.I.E.

The principles, procedures and responsibilities set out in this Regulation shall apply to complaints relating to acts contrary to the Corporate Principles, Code of Business Conduct or to existing legislation where, in the latter case, they are likely to affect the labor order or constitute an offense (hereinafter referred to as '**Reportable Conduct**').

2. Business Ethics and Compliance Complaint Channels

All staff of the Nestlé Group in Portugal shall report, through any of the Complaint³ Channels mentioned in this section, any evidence or well-founded suspicion of an action violating Corporate Principles, Code of Business Conduct or the legislation in force, regardless of how they have become aware of it.

2.1. Normal Channels

All the staff of the Nestlé Group in Portugal may report a Reportable Conduct directly to:

- (i) their **immediate superiors** (People Managers or Business or Corporate Directors)⁴; or
- (ii) the **Directors responsible for the Human Resources, Legal Services and Compliance areas** of Nestlé Portugal, Unipessoal, Lda., whose contact details are as follows:

- **Director of Iberian Legal Service and Compliance Manager:** Luís Rodrigues
E-mail: Luis.Rodrigues@es.nestle.com
- **Head of Human Resources of Nestlé Portugal, Unipessoal, Lda.:** Maria do Rosário Vilhena
E-mail: Maria.Vilhena@pt.nestle.com

(hereinafter referred to as "**Normal Channels**").

2.2. Extraordinary Channel: **SPEAK UP**

When one collaborator considers that, given the specific circumstances of the case, none of the mentioned options in the previous paragraph is suitable, he may use the extraordinary channel called **SPEAK UP**, available 24 hours a day on the 7 days of the week.

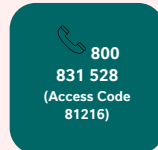
The complainant may leave a written or verbal message.

³ For the purposes of this Regulation, "**Complaint Channels**" means: Ordinary Channels and Extraordinary Channels that Nestlé makes available to group collaborators to make any complaints about Enterprise Ethics and Compliance.

⁴ Where the complaint received concerns a potential breach of criminal law or of the Code of Business Conduct, People Managers or the members of the relevant management shall immediately inform the Compliance Manager; by transferring all the information they have until that date and defining with Compliance Manager the treatment to be given to that information.

HOW CAN YOU ACCESS **SPEAK UP**?

To access this complaint channel, you can choose between using the [SELECT LANGUAGE](#) web page ([speakupfeedback.eu](https://www.speakupfeedback.eu)), the QR code, or calling the phone number and leaving a message that will be recorded and transcribed. The management procedure is the same.



➤ Procedure for bringing complaints through **SPEAK UP**

The communications are managed by the Company "People in Touch, BV", thus providing an additional guarantee if the communicator wishes to remain anonymous. On the contrary, if the communicator discloses its name, it will only be available to the Compliance team and their investigators. If not disclosed, all the interactions will occur via the "individual case number", which is received when reporting a case.

Therefore, the complainant may choose one of the following routes:

- (i) In writing, communications should be made via the link on the Nestlé website (<https://www.speakupfeedback.eu/web/A2VY73/pt/>) or the QR Code.

After entering the system, the on-screen instructions for entering the access code must be followed. Access codes will be displayed on the **SPEAK UP** page. Once the message of the complainant has been sent, an individual file number should be given. The complainant should write down the number and keep it safely, since she/he will be asked to enter the number in question every time she/he accesses the system.

The complainant should return to **SPEAK UP** in order to check the replies to her/his complaint or to provide additional information, such as evidence where appropriate.

- (ii) Alternatively, communications can be carried out via **SPEAK UP'S** permanent freephone 800 831 528. The following access code should then be introduced: 81216.

On this phone, a recording will guide the complainant through the different steps, consisting of:

- (a) Leave the message verbally.



(b) Receive a subject number, which shall be used in subsequent calls, which the complainant may make in order to follow up the communication.

(c) inform the complainant that he will have one (1) working day to enter the system via the web and review the message left and which was transcribed. If the complainant is not satisfied with the transcription of the verbal message he left by telephone, she/he should open a new case and leave a new message in writing or by telephone.

2.3. External channels outside the Nestlé

➤ External complaints

External complaints are those that are directly reported by the complainant to the competent authorities in accordance with his duties and powers, namely:

- a) The Public Prosecutor;
- b) Criminal Police bodies;
- c) Banco de Portugal;
- d) Independent administrative authorities;
- e) Public institutes;
- f) General inspections and similar bodies and other central government departments with administrative autonomy;
- g) Local authorities; and
- h) Public associations.

According to Article 7 of Law No 93/2021 of 20th December, the complainant can only use complaint channels if:

- a) Has reasonable grounds to believe that the infraction cannot be effectively known or resolved internally by the Nestlé Group in Portugal or that there is a risk of retaliation;
- b) Has originally lodged an internal complaint without have been informed of the envisaged measures or taken following the complaint within the relevant period;
- c) The infraction constitutes a criminal offense or a administrative offense with a fine exceeding EUR 50 000.

➤ Public complaint

Public complaints are those reported by the complainant publicly, directly to the media or to journalists.

According to the law, the complainant may only make public an alleged infraction where:

- (a) Has reasonable grounds for believing that the infraction may constitute an imminent or manifest danger to the public interest, that the infraction cannot be effectively known or

resolved by the competent authorities, considering the specific circumstances of the case, or that there is a risk of retaliation even in the event of an external complaint; or

(b) Has lodged an internal complaint through the **SPEAK UP** and an external complaint, or directly an external complaint in accordance with this law, without appropriate measures having been taken within the time limits laid down.

3. Formulation and handling of complaints

3.1. General principles in the formulation and handling of complaints

3.1.1. Good faith

All complaints shall be submitted in good faith and based on reasonable evidence. The obvious lack of foundation or bad faith in the use of the Complaint Channels may lead the Nestlé Group in Portugal to take disciplinary action and/or, if necessary, legal action against the complainant.

The complainant shall be deemed to act in good faith when its complaint is made in accordance with this Regulation and is based on facts or evidences from which a reportable conduct can reasonably be presumed.

Nevertheless, even if the procedures have been followed correctly, there are two exceptions where the protection of the communicant cannot be guaranteed. These are:

(a) Where it has been established that the notification has been made in bad faith. To that extent, a communication shall be deemed to have been made in bad faith when, intentionally and manifestly: (1) if there is no true in the facts described; (2) the facts which may have been relevant for the verification of the facts communicated have been concealed or (3) the information or documents have been altered or manipulated.

(b) In cases where the communication itself constitutes an unlawful act.

3.1.2. Confidentiality

The Nestlé Group in Portugal guarantees the utmost confidentiality of the *bona fide* complainant at all stages of the investigation, which will not be disclosed to third parties, the complainant or his superiors, unless legally imposed or in cases where the complainant has given his express consent. Notwithstanding the above, if deemed necessary for a proper investigation of the facts, Compliance Manager and the HR Directorate will share the information strictly necessary, involving as few people as possible.

The confidentiality undertaking shall cover the content of the complaints received and, where appropriate, subsequent communications between the complainant and the Nestlé group in Portugal.

Any action taken by Compliance Manager, whether by itself or through its employees or third parties designated to conduct the internal investigation, shall comply with the principles of integrity and impartiality and shall scrupulously respect the confidentiality and privacy of all persons involved in the complaint or investigation.

3.1.3. Non-retaliation

The use made in good faith of the Complaint Channels and in compliance with this Regulation shall not have negative consequences for the complainant. The Nestlé Group in Portugal therefore undertakes to prevent, investigate and act against any possible direct or indirect retaliation or threat against a complainant solely as a result of the lodging of a complaint under this Regulation.

3.1.4. Data protection

The Nestlé Group in Portugal undertakes to process personal data received through Complaint Channels relating to any complaints and personal data relating to any investigation in accordance with the current data protection law as set out in paragraph 4 of this Regulation.

3.2. Complaints Content

For appropriate treatment, as far as possible, all complaints shall contain the following information:

- (i)** Identification data of the identified person or group allowing the correct identification of the persons complained of; and
- (ii)** A description of the alleged facts (what, when and how), the evidence supporting the complaint and, as far as possible, an indication of the internal rules of the Nestlé Group in Portugal which were allegedly violated.

Similarly, the Nestlé Group in Portugal allows anonymous complaints to be lodged and it is therefore not necessary for the complainant to have identified itself for the purposes of handling a complaint. Indeed, as indicated in paragraph 2.2 of this Regulation, if the complainant wishes to remain anonymous, the Nestlé Group in Portugal has an Extraordinary Complaints Channel operated by an external service provider called **SPEAK UP**. The use of this Channel of Complaints provides additional guarantees in cases where the complainant does not intend to identify himself.

3.3. The Responsible Management for the handling of complaints channels

The Compliance Committee of the Nestlé Group in Portugal has delegated the management of Complaint Channels to the Legal Services and Compliance (i.e. Compliance Manager) directorates and to the Human Resources Directorate.

Compliance Manager and HR Director therefore commit to lead the handling of received complaints and to treat them impartially, expeditiously and with due diligence, regardless of the Complaint Channel used for that purpose.

Without prejudice to the previous paragraph, Compliance Manager and HR Directorate regularly inform the Compliance Committee (in the context of periodic meetings) about complaints received and may request the other members of the Committee to evaluate complaints.

In addition, complaints concerning several sensitive issues should be reported to the Zone General Counsel and the CCO of the Group. To this end, the table below lists the categories of issues considered sensitive.

SENSITIVE CATEGORIES

- | | |
|--|---|
| 1. Abuse of Power, Mobbing or Bullying. | 7. Fraud (misappropriation or misconduct on accounting or financial statement). |
| 2. Antitrust and Fair Dealing. | 8. Human Rights (Child labor, forced labor and modern slavery). |
| 3. Bribery and Corruption. | 9. MANCOM Members related. |
| 4. Confidential Information, Data Privacy, trade secrets, Intellectual property. | 10. Non-Compliance against WHO Code. |
| 5. Violence and Discrimination. | 11. Sexual Harassment. |
| 6. Executive board members or senior managers in Switzerland. | |

3.4. Conduct of complaints

3.4.1. Preliminary analysis

Compliance Manager and/or HR Directorate has 7 (seven) days to acknowledge the receipt of the complaint to the complainant through the Complaint Channel used by the complainant to report it.

The receipt of a complaint should also inform the complainant of the requirements to which the complaint must comply under this Regulation, as well as the form and admissibility of external complaints and which competent authorities, according to their



powers and responsibilities, must or may have knowledge of the matter in question in the complaint.

Upon receipt of the complaint, Compliance Manager and/or HR Directorate will proceed with a first review of the facts and evidence that were submitted with the complaint. For this purpose, Compliance Manager and/or HR Directorate may require the complainant complete or clarify the information contained in the complaint, providing all additional documentation necessary to support the infringing act.

Next, Compliance Manager and/or HR Directorate and/or Compliance Committee, as appropriate, will decide:

- (a) Admit the complaint and open an investigation; or
- (b) Archive the complaint and fail to act on it for any or some of the following reasons:
 - (i) No clear evidence has been provided that the alleged conduct is contrary to the internal policies of the Group and/or the law in force.
 - (ii) The formal complaint does not comply with the minimum requirements laid down in this Regulation and the complainant has not corrected the errors after being requested to correct them.
 - (iii) The competence to deal with the complaint, given its nature, belongs to another area or department of the Nestlé Group. In this case, Compliance Manager and/or HR Directorate must inform the complainant on which department is responsible.
 - (iv) The allegations have been brought to the attention of a judicial body or an administrative authority which is investigating the same case or is in the process of issuing a decision concerning it or has already been made in the past.

In either case, Compliance Manager and/or HR Directorate inform the complainant of their decision (to admit or archive the complaint) through the channel chosen by the complainant in their complaint.

Compliance Manager and/or HR Directorate records all the complaints received in the *Case Management System* and can document, if appropriate, the decision to admit or archive the complaint as well as the reasons for the decision.



3.4.2. Participation of other external staff and consultants

Once a complaint is accepted, Compliance Manager and/or HR Directorate may request the participation of other contributors, whose role is to provide any additional documentation or information required without delay. Compliance Manager and/or HR Directorate can therefore delegate some aspects of the investigation to other Group contributors or external consultants as they deem appropriate, who should respond to them and follow their instructions.

All the external contributors and consultants called to the process by Compliance Manager must strictly adhere to the established principles in paragraph 3.1 of this Regulation.

INVESTIGATION OF COMPLAINTS CONCERNING HARASSMENT WITH A MAJOR REPUTABLE IMPACT AND/OR A CONFLICT OF INTEREST WITH THE MEMBERS OF THE COMPLIANCE COMMITTEE

In order to conduct investigations into harassment or complaints that may have a high reputational impact and/or may represent a conflict of interest with one of the members of the Compliance Committee, an external consultant must be involved from the moment the reported facts are known to the Compliance Committee of the Nestlé Group in Portugal or Compliance Manager.

This external consultant shall carry out an internal investigation of the facts with the greatest possible guarantees and in any case comply with the principles laid down in this Regulation.

This extraordinary measure aims to safeguard the interests of all parties involved (the complainant, the subject of the complaint and Nestlé) and to strengthen the independence and impartiality of the investigation team.

The costs associated with carrying out this investigation by this external consultant shall be borne by the company and/or function to which the requested person(s) belongs. Otherwise, expenses will be borne by the Compliance department.

3.4.3. Procedure for dealing with complaints accepted/investigation procedure

Subject of the investigation

Regarding the complaints accepted, Compliance Manager and/or HR Directorate conduct, directly or through third parties, in a timely and efficient manner, the internal investigation necessary to determine:

- Whether the facts reported are accurate;
- Whether the facts described constitute a breach of the Code of Business Conduct, internal principles and rules and/or the applicable law; and

- The identity of the person(s) responsible for the conduct under investigation and the degree of their participation or responsibility.

The internal investigation shall be guided in such a way as to guarantee the legality, validity and admissibility of the evidence obtained so that, if necessary, it can be used in future legal proceedings against the person complained of.

Methodology

Any investigation procedure shall comply with the applicable legal provisions, including those contained, where applicable, in the applicable collective bargaining agreement, and shall guarantee the rights to privacy, defense and presumption of innocence of the person complained of.

Compliance Manager, in collaboration with the HR Directorate and, if appropriate, the *Compliance Committee*, sets out the procedure to be followed, which may vary depending on the nature of the reported facts and the circumstances in which the breach occurred. Specifically, the following research aspects should be defined:

- Scope of the internal investigation;
- The adoption of precautionary measures judged necessary in order to preserve the relevant evidence;
- The measures necessary to establish the truth of the facts communicated, including, in particular, the conduct of investigations, the intervention of IT devices and/or the communication of the collaborators under investigation, the examination of any documentation and on any medium and/or the request for information from external sources;
- Whether it is necessary to involve any department of the group at any stage of the investigation;
- Whether external consultants need to be involved.

Compliance Manager and/or HR Directorate will report to the person complained of, if necessary, of the complaint received.

If necessary, Compliance Manager and/or HR Directorate will schedule an audience with the person complained of. This hearing shall serve to present the facts complained of and give the complainant the opportunity to present his version of the facts while respecting the presumption of innocence, the applicable law and the applicable bargaining agreement.

In the framework of the investigation, access to e-mail, files, call logs, Internet history, other records (including inbound and outbound records, costs and travel log), security copies and other relevant documents may be granted as appropriate, to the extent that such access is in accordance with the applicable laws and regulations. To this end, Compliance Manager and/or the HR Directorate shall seek expert advice as necessary, including the input of Data

Protection Champion, to ensure that such access is carried out in such a way that it fulfills the necessary safeguards to protect the personal data involved.

Completion of the investigation

Compliance Manager and/or HR Directorate have a duty to complete any investigation as soon as possible and without undue delay.

No later than 3 months after the date of receipt of the complaint, Compliance Manager and/or the HR Directorate shall communicate to the complainant the measures planned or taken to follow-up on the complaint and the respective grounds.

On the basis of the outcome of the internal investigation and as soon as it can be concluded that the alleged acts constitute an infringement of the person complained of or any other collaborator or collaborators, Compliance Manager and/or HR Directorate shall, where possible, issue a formal written decision specifying the following: (i) whether the facts reported are true; (ii) whether the facts reported constitute a breach of internal principles and rules and/or of the applicable law; and (iii) the identity of the person or persons responsible for the act under investigation and the extent to which they participate or are liable in the acts under complaint.

The Compliance Manager and/or HR Directorate informs the complainant and the complained about the outcome of the investigation, except in cases where it is advisable to keep the findings confidential.

The complainant may at any time request Compliance Manager and/or HR Directorate (as applicable) to report the result of the review to the complaint within 15 days of its conclusion.

In cases where it has been established that the alleged acts constitute a breach of internal principles and rules and/or applicable legislation, the HR Directorate, together with Compliance Manager and, where appropriate, the Compliance Committee, shall assess the disciplinary measures to be taken in accordance with the principles set out in the following paragraph of this Regulation and the applicable legislation.

In addition, in cases where there is evidence of unlawful behavior, the Nestlé Group in Portugal may initiate legal proceedings (including criminal proceedings) it considers appropriate against the person or persons responsible for such unlawful conduct.

Principles governing the disciplinary procedure

In order to deter behavior contrary to the internal rules and/or to the law, appropriate disciplinary measures should be taken not only against those who commit the conduct actively and directly, but also against those who:

- Play a prominent role in concealing or preventing detection of Reportable Conduct;
- Encourage or induce third parties to participate in the Reportable Conduct.

- They do not fulfill their duty to inform the Nestlé Group of Reportable Conduct (through Report Channels).

Any breach of the obligations arising out of the Corporate Principles, the Code of Business Conduct or the applicable law may involve the initiation of disciplinary proceedings and the subsequent imposition of appropriate disciplinary measures; acting under the command of a hierarchical superior is not considered a valid excuse.

If, as a result of the investigation carried out in accordance with point 3.4.3, it is found that a member of the Nestlé group has failed to fulfill his obligations, the HR Directorate shall inform the staff member concerned of the findings of the investigation and of the subsequent procedures applicable.

Where the investigation indicates that work and its duties are not being carried out, the competent disciplinary procedure shall be instituted and, in the end, disciplinary sanctions may be imposed according to the graduation of the infractions and penalties provided for in the general provisions of law and the collective bargaining agreement applicable in each case.

If the infraction was committed by a person who is not directly employed by the companies of the Nestlé Group in Portugal, that information shall be communicated to the employer of that person. Without prejudice to the disciplinary authority to which the individual is subject, the Nestlé Group in Portugal must assess the need for appropriate sanctions based on the contractual relationship with the employer and/or inform the competent authorities.

Rights secured

At all stages of the investigation and during the disciplinary procedure, the applicable legal provisions, including those contained, if pertinent, in the applicable collective bargaining agreement, should be respected.

In addition, the rights to privacy and the presumption of innocence of the accused will in any case be respected.

The complainant shall be allowed to see, rectify and approve the transcript of the respective complaint or minutes of communication or meeting where it was made, and must sign it.

Record keeping

In accordance with the provisions of this Regulation, Compliance Manager shall keep a detailed and up-to-date record of all complaints received and investigations carried out under the Case Management System tool for the period of 5 years or for the time necessary to complete any judicial or administrative proceedings in relation to the complaint concerned. The relevant supporting documentation may also be included in that register.

4. Data Protection

4.1. Existence of a personal data file

In accordance with the provisions of the personal data protection law, data provided through Complaint Channels and resulting from investigations and inquiries should be included in a personal data file owned by Nestlé Portugal, Unipessoal, Lda.

4.2. Processing of personal data

The Nestlé group in Portugal undertakes to always treat personal data received through Complaint Channels in a confidential manner and in accordance with the objectives of this Regulation and to take the necessary technical and organizational measures to ensure the security of the data and to avoid any modification, loss, processing or unauthorized access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed.

The Nestlé group in Portugal shall subsequently collect and process personal data received through Complaint Channels in order to manage complaints submitted and carry out the necessary investigations into alleged infractions in accordance with the rules laid down in this Regulation. The Nestlé group in Portugal will specifically process personal data in order to verify the validity of complaints, to communicate them to other internal functions within the Nestlé group in Portugal where necessary, or to request support in the investigation of alleged facts, to communicate the outcome to all parties involved and to maintain a detailed and up-to-date record of all complaints, inquiries and consultations.

All personal data relating to the allegation of irregularities and stored for statistical purposes shall be kept anonymously.

4.3. Communication of personal data

The Nestlé group in Portugal may disclose personal data received through Complaint Channels to other companies in the group only to the extent that this is necessary for carrying out the relevant investigations and may involve external service providers such as external consultants, who will act as subcontractors of the data, in accordance with the instructions received by the Nestlé group in Portugal.

Since disclosure or access of some of the above-mentioned parties may involve the international transfer of these personal data outside the European Union, the Nestlé Group in Portugal has put in place appropriate security measures to ensure that personal data receive a sufficient level of protection.

4.4. Information to the complainant

In general, Compliance Manager has a duty to inform the person complained of as soon as possible of the following:

- The facts for which she/he is being charged;
- The responsible authority for managing the Complaint Channels;
- Departments of the Nestlé group in Portugal or other third parties which may have access to the information communicated; and
- How to exercise your rights in relation to your personal data.

All persons involved in a complaint shall be informed, as soon as possible, of the way in which their personal data will be processed. The persons concerned may include complainants, witnesses, third parties and persons complained of. Nevertheless, it will not be necessary to inform all third parties mentioned in the alleged facts, if this would involve a disproportionate effort.

However, where there is a risk that such notification would compromise the ability of the Nestlé group in Portugal to effectively investigate the alleged facts or to collect the necessary evidence, notification to the complainant may be delayed for as long as such a risk exists. This delay shall be decided on a case-by-case basis.

In addition, the person complained of shall not be informed of the identity of the complainant unless this is the result of a legal requirement or other legitimate interests and permitted by applicable data protection and labor law.

4.5. Data quality principle and rights of access, rectification, erasure and opposition to processing

Users of Complaint Channels may, in accordance with the applicable legal provisions, exercise the rights of access, rectification, erasure and opposition of their personal data by means of a written communication to the following e-mail address: dataprotectionpt@pt.nestle.com, attaching a copy of their identity card or equivalent identification document and indicating the specific right they wish to exercise. In addition to the above rights, users are also entitled to oppose the processing of their personal data at any time, for reasons related to their specific situation, where the processing is based on a legitimate interest.

In any event, the personal data processed in **SPEAK UP** shall be erased within five years of the end of the investigation of the facts alleged in the complaint or if the facts reported are considered unfounded. At the end of the period of retention of the data referred to above, the Nestlé Group in Portugal shall erase the data unless prohibited by law or required by law.

Reports and records relating to legal proceedings or pending investigations shall not be deleted. In such cases, personal data contained therein shall be retained during the judicial proceedings or investigation concerned or for a longer period in accordance with the applicable limitation periods, to the extent required by the applicable law.