



# Speaking Up: No Retaliation<sup>1</sup> Reporting Process Lilly NL

Version 2.0  
February 20, 2024

The basic internal Lilly Principles are:

- To exercise good judgment and strive to do the right thing when carrying out their job responsibilities.
  - To speak up and report known or suspected issues, concerns, or behavior that could harm Lilly or those we serve.
  - To share ideas openly and honestly.
  - To listen to diverse perspectives from one another as well as from the outside world.
  - To understand that retaliation<sup>1</sup> is not tolerated.
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The following process applies for internal Lilly reporters and for external reporters.

## **Netherlands specific reporting regulations**

A suspicion of abuse within the meaning of the Dutch Whistleblowing Act can be reported in line with this policy.

- A suspicion of abuse is defined as "the suspicion of a reporter that, within the organization in which work is or has been performed, or within another organization if through the work contact has been made with this organization, a situation of abuse occurs or has occurred, insofar as this suspicion is based on reasonable grounds arising from the knowledge that the reporter acquired while working for his/her employer or which arises from the knowledge that the reporter obtained while working for another company or another organization."
- An abuse is defined as a violation or risk of violation of European Union law or an act or omission involving the public interest at stake in:
  1. a violation or risk of violation of a statutory regulation or internal rules containing a concrete obligation and established by the employer pursuant to a statutory regulation; or
  2. a danger to public health, to the safety of persons, to damage to the environment or to the proper functioning of the public service or a company as a result of an improper manner of acting or failing to act.

## **Internal/external reporting and investigation process:**

Internal and external reporters may report a concern in 4 ways:

- A. You may report a suspicion of abuse within the meaning of the Dutch Whistleblowing Act (as mentioned above) to the **Human Resource department within Lilly NL: [nl\\_hr@lists.lilly.com](mailto:nl_hr@lists.lilly.com)**
  1. If necessary, the person handling the report may request you to clarify the reported information by email or phone.
  2. Reports made orally will be recorded or documented in writing.
  3. The reported information will be kept confidential unless the need for disclosure arises from statutory provision or from the performance of the task.
  4. You will receive an acknowledgement of receipt via the Manager-HR as soon as possible and within seven days. After that, the Manager-HR will provide feedback in writing within a reasonable period of time, not exceeding three months after the acknowledgement of receipt.
  5. The identity of the reporter and the relevant information will not be disclosed without the reporter's consent. Lilly will take all reasonable steps to keep a reporter's identity confidential consistent with Lilly's ability to address the concern and with Lilly legal obligations (anonymous or confidential)

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<sup>1</sup> Retaliation = vergelding, wraak



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- reporting). If a complaint is submitted on an anonymous basis, access to a copy of the report shall be strictly limited to those Lilly personnel who need to have access in order to complete an investigation.
6. The reports will be preserved in a register, in compliance with the GDPR.
  7. In case of suspicion of abuse Lilly Netherlands will initiate an investigation for interviews. Lilly takes concerns seriously and actions are taken, as appropriate. We are committed to ensure appropriate management oversight when there are allegations requiring their attention. There are designated employees responsible for notifying appropriate management.
  8. There will be no retaliation against you for speaking up. This applies to the reporter and to those that assist a reporter and internal investigators of a report are also protected against detriment now. Retaliation is negative actions or consequences you experience after and because you spoke up with a concern, participated in a Lilly investigation, or observed a potential violation.

- B. You may report by telephone or online through the **Global Ethics and Compliance Hotline**, which is available 24 hours a day, 7 days a week.
- o [www.lillyethics.ethicspoint.com](http://www.lillyethics.ethicspoint.com)
  - o 0800-0226174

The use of the Hotline service is permitted in limited circumstances only: *Reports relating to a suspicion of abuse within the meaning of the Dutch Whistleblowing Act (as mentioned above), suspected or observed violations of local law and/or Lilly policy or procedure specifically concerning the **areas of accounting, auditing, banking, internal controls, or anti-corruption (bribery), as defined by the United States Sarbanes-Oxley law.*** These will be investigated by Lilly similarly as stated above in point 1. If you accidentally report other types of concerns through the global hotline it will be referred back to NL Lilly HR department.

- C. You may report concerns Lilly by **email** at [SpeakUp@Lilly.com](mailto:SpeakUp@Lilly.com). These will be investigated by Lilly global, or Lilly Netherlands similarly as stated above in point 1.
- D. Finally, you may consider reporting to external authorities immediately, without first reporting through Lilly's channels. See the Dutch whistleblower protection law (Chapter 1a. External reporting channels for further information). Similar protection will be provided as when you report to Lilly.

### Lilly Netherlands Management Responsibilities:

- To take all reasonable steps to prevent, detect and report any actions that do not meet the requirements of this procedure.
- To participate in investigations and work with human resources and ethics and compliance to identify and implement appropriate corrective actions.

### Corrective and Preventative Action:

In order to implement the appropriate corrective and preventative action, Lilly may:

- Revise applicable policies, standards, or procedures.
- Provide additional training or clarification of existing training.
- Administer disciplinary action.