

# Speak Up Policy

Version: 2.1  
Ownership: Legal Team  
Expert(s): Legal Team

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### 1. INTRODUCTION

At Fairphone, we are committed to conducting our business with integrity, transparency, and fairness, for people and the planet. We aim to create safe and trusted spaces for anyone, whether inside or outside our company, to raise concerns about practices that may be unethical, unlawful, unsafe, or misaligned with our values.

If you have a concern, we encourage you to report it promptly and in the public interest. Your identity will be protected, and you will not face retaliation for speaking up in good faith.

Our values are reflected in our core compliance policies, including, but not limited to, our [Ways of Working](#), our [internal] [Anti-Bribery, Gifts and Entertainment](#), and [Privacy Policies](#) (collectively, “Compliance Policies”).

This Speak Up Policy (“Policy”) explains how you can raise a concern, how your report will be handled, and what you can expect from us in return.

Our grievance mechanism is built on key principles such as accessibility, transparency, equity, and predictability. It is aligned with international standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises.

## 2. SCOPE

### Who can use this policy?

This policy is open to any person who wishes to raise concerns about suspected misconduct linked to Fairphone's operations or value chain. This includes:

- Employees (applicants, current or former)
- Workers in our value chain (e.g., manufacturing, assembly, logistics, raw material sourcing, recycling)
- Direct and indirect suppliers, subcontractors and business partners and their employees
- Customers
- Civil society organizations, trade unions, NGOs
- Communities affected by our business activities
- Customers, end-users, or third-party observers

### What types of concerns can be reported?

You can use this policy to report any concern that you believe violates:

- Health and safety
- Ethical or lawful business conduct
- Human rights
- The environment
- Information Security
- Anti-Competition, antitrust or privacy and data laws
- Fairphone's Compliance Policies, including but not limited to, the Fairphone Ways of Working Together and the Anti-Bribery, Gifts and Entertainment Policy

Examples of issues include:

- Unsafe or unfair working conditions
- Discrimination, intimidation, (sexual) harassment, or abuse
- Forced or child labor
- Environmental pollution or unsafe disposal of materials
- Bribery, fraud, or corruption
- Improper sourcing of raw materials (e.g., minerals used in electronics)
- Improper use of company resources
- Criminal or administrative offences

In case of immediate threat to either life or property, please reach out to the emergency services and/or local authorities.

This Policy should not be used:

- with malicious intent including to make false accusations, or report deliberately untrue information (this could lead to disciplinary measures against the reporter);

- for issues or grievances you may have in relation to personal Human Resources matters (e.g. your terms of employment or performance related issues). For such matters your direct manager and/or the People Team are the primary points of contact;
- to settle personal disputes; and
- to obtain answers to questions or to provide comments on Fairphone policies/procedures or interpretation of their applicability.

### 3. HOW TO RAISE A CONCERN (SPEAK UP)

We welcome and value your voice. Speaking up helps us identify, address, and prevent harm, and strengthens our culture of openness and accountability.

Where appropriate and safe, we encourage you to first try resolving concerns by speaking directly with the person involved or discussing the issue with your manager. Open, respectful conversations can often lead to quick and constructive solutions.

However, we understand that this may not always feel safe or possible. If you are uncomfortable doing so, or if the issue remains unresolved, you can use the formal reporting channels outlined below. All concerns will be taken seriously, whether raised informally or through the [Speak Up platform](#) ("Platform").

#### Speak up channels:

You can speak up through the following channels:

- Directly to the person(s) involved
- Your direct manager or Fairphone's People Team. For internal reports, Fairphone's own employees can also approach their direct managers, who may be able to address their concern or redirect it to the appropriate person. In case this is inappropriate, or the employee does not feel comfortable approaching the corresponding manager, they can also approach any other company representative (including Fairphone's Works Council) or manager.
- Trusted Person: The External and Internal Confidants<sup>1</sup> also serve as trusted points for you to ask for advice, or raise questions or concerns about suspected misconduct(s), when you do not feel comfortable speaking up to the above mentioned people. The Internal Confidants are members of the People Team who have received dedicated training to handle all matters with care and strict confidentiality. When concerns are brought to them in this role, they act solely in their capacity as Internal Confidants and not as representatives of the People Team.
- [Web-based Speak Up platform](#): open 24/7 and publicly available in multiple languages, managed by an independent third party. This Platform can be used to raise concerns confidentially, and anonymously when preferred. We do encourage reporters to include their name as this can help to conduct the investigation more effectively. Any personal data provided will be treated confidentially and in compliance with the applicable regulations and [our Privacy Policy](#).
- Emails: [speak.up@fairphone.com](mailto:speak.up@fairphone.com) to reach the Ethics Committee directly or [speak.up.supervisory.board@fairphone.com](mailto:speak.up.supervisory.board@fairphone.com) to report to the chair of Fairphone's Supervisory Board.
- By letter: to FairPhone B.V. Van Diemenstraat 200 1013CP Amsterdam, the Netherlands, attention to Ethics Committee.

<sup>1</sup> Details for the External and Internal Confidants can be found on the Employee board and in the relevant Fairphone policies (incl. The Employee Handbook) and communications.

- Local champion: depending on your location, there might be a local Fairphone champion you can reach out to.
- Additional local grievance channels may be available to workers or stakeholders in the value chain. They will usually be offered in the local language(s) and attuned to the local circumstances. They may be operated by independent organisations or project partners of Fairphone. Whether or not Fairphone is notified of any concerns or involved in remediation processes will depend on the channel.

### **Speak up early:**

You don't need to have all the details, just enough information to help us understand your concern. The sooner we receive a report, the sooner we can look into it and take action.

### **Who handles my concern?**

Your report is reviewed by the Ethics Committee, unless it involves Fairphone's senior leadership (Management Team or Board, hereinafter respectively "MT" and "MB") or the Ethics Committee itself, in which case you should reach out to Fairphone's Supervisory Board ("SB") points of contact (namely the chair of the SB and the chair of SB's Audit & Risk Committee) via [speak.up.supervisory.board@fairphone.com](mailto:speak.up.supervisory.board@fairphone.com). For concerns involving the SB itself, the Ethics Committee is in charge.

Internal concerns (related to Fairphone's own operations) are assigned to the Head of Legal and Director of People & Culture while external reports (related to Fairphone's value chain) are received by the Head of Legal and Head of Impact Innovation. Your report is then assigned to a dedicated case manager who might involve relevant additional stakeholders where appropriate. In any case, all involved people are bound by confidentiality and are informed on a strict need-to-know basis.

### **Can I report anonymously?**

Yes. You can file a report anonymously via the [Speak Up Platform](#). This Platform supports confidential, two-way communication and allows you to remain unidentified if you wish. Please see further details in Section 5 below.

### **Accessibility and support:**

We strive to ensure the grievance process is available and understandable for everyone. We:

- Offer multiple language options
- Ensure mobile-friendly access
- Provide assistance for complainants with low literacy or digital barriers

### **Helpful information to include in your report:**

Please provide as much information and detail as possible about the case you are reporting, including:

- What happened? (Description of the issue)
- When and where did it happen (Dates and places)?
- Who was involved (Names)?
- Any supporting documents or evidence?

### **Not sure about all the facts? That's okay.**

We encourage you to speak up with what you know. You don't need to be certain or prove misconduct, that's our responsibility. Please do not attempt to investigate yourself.

#### 4. WHAT HAPPENS WHEN YOU SPEAK UP

We take all concerns seriously and follow a structured process to ensure every report is handled fairly and professionally.

##### Step-by-step process for concerns:

1. Confirmation of submission:
  - a. If you submit your report via the [Speak Up Platform](#), after submitting your report you receive a unique case number and the corresponding QR code for you to log back into the system and follow up on your report. Please store these carefully as there is no other way to access your report. Without this code, you will not be able to access the report or see any follow-up responses from the Ethics Committee.
  - b. If you use a different channel to Speak Up: You will typically not receive a confirmation of submission since these channels are not automatized.
2. Acknowledgement of receipt:
  - a. If you submit your report via the [Speak Up Platform](#), email or any other written form, you'll receive confirmation within 7 calendar days after reception that your report has been received.
  - b. If you report verbally, typically no acknowledgment of receipt will be handed to you.
3. Triage & screening: We assess whether the issue is within the scope of our policy, determine severity, and assign a case manager.
4. Investigation: If necessary, a confidential investigation will be carried out. This process may include documentation review, interviews, and data analysis. The duration of this investigation process will depend on each individual case and the reporter will be updated regularly on the status. The investigation will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles.
5. Remedy and feedback: Based on the conclusions of the investigation, if it is found that misconduct has occurred, and appropriate remedial measures implemented. Impacted rightsholders or their representatives may be consulted and engaged in determining the remedy. We commit to providing feedback on the follow-up measures within a reasonable timeframe, typically no later than 3 months from the acknowledgement of receipt of your report.
6. Once the case is closed, we'll inform you (as much as confidentiality allows) and outline any remediation actions taken. You will be asked how satisfied you are with the process provided and the outcome(s).

Fairphone retains the right not to investigate a report further. This can be the case where:

- There is insufficient information to conduct an adequate investigation to be conducted and no possibility of obtaining further information (e.g.: you are not replying to our requests for follow-up).
- It is established that the report was made in bad faith.
- The report concerns grievances regarding a matter not in scope of this Policy, e.g. a Fairphone employee remuneration policy.

For concerns raised through channels other than the Speak Up Platform and email, we will aim to follow the outlined process, provided you have shared your contact details.

**Engagement and dialogue:**

Where possible, we aim to maintain respectful, ongoing communication, especially in cases that may affect communities or vulnerable groups.

If you become involved in an investigation, you need to cooperate, answer all questions completely and honestly and respect the confidential nature of the case. Details of the reporter, the reporter's identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a strict need-to know basis with Fairphone officers, specialized staff and/or associates and/or external investigators involved with the investigation. The disclosure of your identity will always be discussed with you prior to any further internal and/or external reporting, unless there is a severe interest at stake.

If informed, Management at all levels is expected to cooperate fully with and assist whoever is appointed to investigate the misconduct.

In principle, and in accordance with applicable laws, we are obliged to inform the implicated person once they are officially under investigation. This can be delayed if there is a substantial risk that evidence will be destroyed or the investigation will be impeded.

Consistent with the need to conduct an adequate and impartial investigation, Fairphone will apply the right to hear and be heard: the implicated person will be granted the opportunity to state their view on the allegations made during the investigation.

**Remedy:**

In accordance with the OECD Guidelines, Ethical Trading Initiative guidelines and international good practice, we are committed to ensuring that remedies are:

- Proportionate and appropriate to the harm suffered
- Designed with the input of affected parties, where feasible
- Seek to restore the affected person(s) to the situation they would be in had the adverse impact not occurred (where possible)
- Designed to ensure that the remedy does not leave the affected person(s) in a worse position than before
- Aimed at preventing recurrence, not just addressing individual instances

Examples of remedy actions may include:

- Acknowledgment and formal apology
- Financial or in-kind compensation
- Reinstatement or re-employment (where relevant)
- Medical support or rehabilitation services (e.g. in case of injury)
- Environmental remediation
- Revision of contracts, working conditions, processes or policies
- Disciplinary actions
- Termination of unethical relationships (e.g. disengagement from a supplier)

In designing remedies, we also consider how to avoid causing unintended harm or further risk to the reporter, especially in sensitive cases. Wherever possible, we offer reporters the opportunity to participate in remedy discussions and to evaluate whether they consider the remedy satisfactory.

If a violation is confirmed, we will take appropriate corrective and preventive actions as outlined above.

Remedies will vary depending on the nature and extent of the adverse impact and whether the issue involves an internal or external party, and, if external, where that party sits within Fairphone's value chain and the subsequent level of leverage Fairphone has.

## 5. CONFIDENTIALITY & NON-RETALIATION

We are committed to protecting the privacy, dignity, and safety of everyone involved, especially the person raising a concern.

### Confidentiality:

- All reports are kept strictly confidential
- Information is only shared with those who need it to investigate or resolve the issue, unless required by law
- We comply with all data privacy laws

### Reporting anonymously:

All parties involved, including the implicated person, are entitled to confidentiality in order to avoid unnecessary damage to their reputation.

The reporter has the right to submit a report anonymously. Anonymous reports can be submitted using the [Speak Up Platform](#), where there is a specific function to allow the case manager to contact them for any questions or feedback required in all anonymity.

In case the reporter discloses their identity, this will be treated confidentially, together with the content of the report, the names of the persons named in the report or other people affected. The case manager and any other person involved in the investigation always ensure the confidentiality of the reporter. This is ensured by the fact that all identity-related information is not processed on Fairphone's IT infrastructure but exclusively on servers of the tool provider. Only the case manager and relevant investigators and the employees of the tool provider have access to the data on the servers of the tool provider (a data processing agreement pursuant to the General Data Protection Regulation has been signed with the tool provider). Confidentiality is also ensured with the electronic file management.

Through the independent [Speak Up Platform](#) we can guarantee you full anonymity if you follow the steps below:

- If possible, do not report from a computer/laptop provided by your employer.
- Do not use a computer/laptop that is connected to the company's internal network.
- Access the reporting system directly by copying or writing the URL address in an internet browser rather than by clicking on a link.

We fully respect and protect the right to report anonymously. However, limited information may restrict our ability to investigate thoroughly, provide updates, or offer personalized remedies. In some cases, anonymity may also limit our ability to escalate the matter externally, such as reporting to law enforcement or supporting legal proceedings, if additional evidence or formal identification is required. Despite these limitations, all credible concerns, whether anonymous or not, will be taken seriously, assessed and addressed in line with our due diligence obligations.

**Protection from retaliation:**

- You will not be penalized for reporting in good faith, even if the concern turns out to be unfounded
- Retaliation is treated as a serious violation and will be investigated separately
- If you experience retaliation, please report it via the [Speak Up Platform](#)

In the context of this Policy, retaliation means adverse conduct taken when an individual reports an actual or perceived violation of the Compliance Policies and/or practices that aren't allowed by it.

Deliberate misreporting or reports only intended to cause harm will not be covered by the whistleblower protection, Fairphone may then share the reporter's name and take actions against them under the law.

## 6. GOVERNANCE & RESPONSIBILITIES

**Information, oversight & review**

As outlined throughout this Policy, our values and principles are enshrined in our Compliance Policies and everyone is expected to act in accordance with their letter and spirit and to respect and abide by the laws and regulations of the countries and industries in which Fairphone operates.

Internally, it is the responsibility of the Fairphone MB to ensure that everyone is aware of the Compliance Policies and that they are observed. MB is informed of material risks and trends, and must ensure adequate resourcing. It is every manager's responsibility to ensure their team is sufficiently aware and informed.

The Fairphone Ethics Committee is in charge of overseeing the proper implementation and yearly review of this Policy. It also manages the cases intake, triage and investigation. It is based at Fairphone's headquarters in Amsterdam, the Netherlands and composed of the Head of Legal (Chair), the Director of People & Culture and the Head of Impact Innovation.

The Fairphone Legal Team is also there to answer any questions you may have regarding this Policy. We regularly review data and feedback to improve this mechanism and Policy and ensure they remain trusted, effective, and in tune with stakeholder needs.

**Case Management**

Depending on the type of concern (external or internal) the relevant members of the Ethics Committee are responsible for acknowledging reported misconduct and determining the responsible case manager, directing the report to the relevant people, in-line with pre-defined categories and responsibilities.

Any person involved in the investigation operates independently, they are not subject to any instructions from management in this function, and they ensure the case management aligns seamlessly with compliance needs.

In case of a complaint involving the Ethics Committee, MB or MT, the complaint will be directed to the SB points of contact only, who will be responsible for the case management.

## 7. STAKEHOLDER & ENGAGEMENT

We believe grievance mechanisms work best when they're informed by those who use them.

- We consult external stakeholders like NGOs, community leaders, and worker representatives, on how to make our mechanism more accessible, responsive, and culturally appropriate
- We welcome feedback through surveys, consultations, or focus groups
- Learnings from grievances may be shared (anonymously) to raise awareness and drive change

## 8. TRAINING & AWARENESS

We are committed to building awareness and trust to ensure this mechanism is used effectively.

- Internal training: Our employees and managers receive regular training on the Policy, how to use the [Speak Up Platform](#), and how to respond to and escalate grievances. Training is organised as follows:
  - Bi-yearly onboarding sessions for new hires who joined Fairphone in the previous 6 months.
  - Yearly refresher sessions for existing employees.
  - For the purpose of the launch of the Speak Up Policy 2.1, training sessions will be offered during Q1 2026 with the purpose of having a minimum of 95% of employees trained by the end of that period.
- Suppliers & partners: We engage with suppliers and partners to raise awareness of this policy and all relevant Fairphone's Compliance Policies. The Speak Up Policy is an integral part of supplier and partner contracts and encourages the use of the mechanism by their workers and other stakeholders. Key indicators for the awareness in the supply chain may include:
  - The absolute number of manufacturing sites of suppliers where Fairphone's Speak-Up tool is accessible to supply chain workers and/ or local communities, and people are trained on its use. Target for the end of 2026: 2.
  - The percentage of annual supply chain spend that the suppliers represent where Fairphone's Speak-up tool is accessible to supply chain workers and/ or local communities, and people are trained on its use. Target for the end of 2026: >80% of direct supply chain spend.
  - The number of grievances received from supply chain workers and/ or communities. (No target).
- Throughout the value chain, also beyond our direct suppliers, Fairphone supports programs and capacity building to foster a culture for dialogue. This includes strengthening supplier's internal or local grievance channels, worker or community representation and other forms of systematic stakeholder dialogue. Fairphone may communicate about the [Speak Up Platform](#) with supplier's workers and/ or their representatives via announcements at suppliers production sites, training or other means available. Value chain workers and communities

may be encouraged to reach out directly to Fairphone using the [Speak Up Platform](#) or to use other grievance channels that may be accessible to them in their local language, depending on the local circumstances and their position in Fairphone's value chain. Depending on the channel, Fairphone may or may not be involved in training and awareness building, notified of raised concerns or involved in remediation processes.

## 9. CONTINUOUS IMPROVEMENT

To ensure the adequacy of the grievance and remediation policy and implementation, the effectiveness of this procedure will be reviewed at least once every year and on an ad hoc basis if required. The evaluation will be performed by the members of the Ethics Committee with the support of the Legal Team, to which they may invite other relevant Fairphone staff or stakeholders.

## 10. PUBLIC REPORTING

Fairphone may report high level, anonymous, aggregated data on the use of the Speak Up Tool and the concerns or grievances received, which may include:

- The number of grievances filed to Fairphone in the reporting year,
- The number of grievances related to Fairphone's internal operations and to the value chain,
- The type of grievances reported or the high level topic it addresses,
- The number of grievances resolved,
- The number of grievances resolved where the reporter was satisfied with the process and outcome(s),
- Examples of how grievances were investigated and resolved to the satisfaction of the reporter or affected stakeholder(s).

## 11. PROTECTION OF PERSONAL DATA

We are committed to protecting the personal data of all individuals involved in the grievance process. Any personal information shared in a report, or gathered during an investigation, will be handled in line with our [Privacy Policy](#) and applicable data protection laws.

Recordings of any disciplinary measures taken as a result of a report will be retained and processed in accordance with Fairphone's [Privacy Policy](#). Access to such records is restricted and handled on a strict need-to-know basis.

No confidential data will be published. No data that may lead to the identification of the reporter, the affected person(s) or the involved person(s) or (value chain) entities will be shared publicly, without their explicit prior approval.

Approved by the Management Board:

Signed by:



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Raymond van Eck  
CEO / Managing Director

Signed by:



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Oscar Visser  
CFO / Managing Director

**12. VERSION MANAGEMENT TABLE**

Version	Date (yy/mm/dd)	Changes
1.0	2023-10-31	First iteration
2.0	2025-12-04	<ul style="list-style-type: none"> <li>● Overall improvement</li> <li>● Scope expansion to include externals</li> <li>● Revised Ethics Committee Composition</li> <li>● Detailed follow-up and remedy section</li> <li>● Public Reporting Commitment</li> <li>● Approved by the MB via MB Resolutions</li> </ul>
2.1	2026-02-23	Correcting the Trusted Person reference (initially the Head of Legal) to align with our existing Internal and External Confidants. This was previously overlooked.