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## 雀巢大中华区合规举报系统

雀巢的声誉有赖于公司对正直、诚实、公平交易以及守法经营的承诺。合规一直是雀巢业务运作的基石。为帮助员工和外部利益相关方共享此承诺，建立强有力的、不妥协的合规文化，雀巢大中华区自2021年4月1日起，将合并内、外部廉正举报渠道，形成一套统一的合规举报系统。该系统继续由独立第三方负责管理。整合后的合规举报系统为员工、外部利益相关方和公司之间保密地沟通提供了便利，使员工、外部利益相关方在放心、受保护的环境下举报潜在的法律、监管或商业道德方面的不当行为。

雀巢合规举报系统适用于外部利益相关方以及雀巢大中华区内所有的业务部门、职能部门、全球性和区域性管理的业务部门和各地的运营实体，其中包括雀巢（中国）有限公司总部、所有运营公司、研发中心、中国特色业务单元、前述所有实体的分公司，以及将来成立的所有法律实体及其分公司。

合规部门必须将所有涉及以下11类的敏感举报上报瑞士总部首席合规官以及AOA区域总法律顾问。

- 滥用权力或围攻欺凌
- 反垄断与公平交易
- 贪污贿赂
- 机密信息，隐私政策（数据隐私、商业秘密、知识产权）
- 暴力及歧视
- 瑞士执行董事会成员/高级经理
- 欺诈（会计/财务报表/侵占或挪用资金）
- 人权（童工、强迫劳动及现代奴役）
- MANCOM 成员相关
- 违反 WHO 守则的不合规行为
- 性骚扰

员工、外部利益相关方均可以采取下列方式举报可疑的不当行为：

1. 合规举报系统热线

合规举报系统热线可以在任何时候（7天/24小时）免费使用。

免费电话号码： 108007440179 (中国大陆网通公司)

108004400179 (中国大陆中国电信)

800963161 (香港)

00801444317 (台湾)

2. 合规举报系统网站

网站地址：[www.speakupfeedback.eu/web/A2VY73/cn](http://www.speakupfeedback.eu/web/A2VY73/cn) (中国大陆)

[www.speakupfeedback.eu/web/A2VY73/hk](http://www.speakupfeedback.eu/web/A2VY73/hk) (香港)

[www.speakupfeedback.eu/web/A2VY73/tw](http://www.speakupfeedback.eu/web/A2VY73/tw) (台湾)



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一旦您接通合规举报系统热线或登录合规举报系统网站，您将被要求提供以下系统接入码：

81729 (中国大陆)

14764 (香港)

97363 (台湾)

在您输入系统接入码后，您将收到一个专属的案件号码。该号码是您进入合规举报系统的个人密钥。您可以凭此号码查询案件处理的进展情况，还可以留下进一步信息。下一次进入此系统时，您将被要求提供此号码。因此，请记住此号码并妥善保存。

一旦收到专属的案件号码后，您就可以举报了。在您举报留言前，您需要根据您的举报内容选择违规行为类别。如果您使用的是举报电话，请注意您将不会和接线员通话，而是要留下语音信息，此语音信息将被录音。如果您使用的是网站，您可以附上相关文件。

您的举报，或如果您使用举报热线，您语音信息的转译文字记录将被传送给雀巢大中华区合规负责人。公司会非常认真地对待您的举报，并将采取适当的行动，您将在大约一周之内收到首次回复，也可能有后续问题需要您回答。您只需致电合规举报系统热线或登录合规举报系统网站，凭您的案件号码进入或登录，就可以查阅回复。

同时，我们在此也清晰地描述公司处理员工/外部利益相关方担忧及投诉所采取的几个步骤，以便大家可以了解此系统是如何运作的。

**1、确认：**在收到信息之后，公司（法律及合规部门）将通常在五个工作日内向您回复确认收到举报。如果您首次举报提供的信息没有充分的证据支持，公司可能会联系您并要求您提供更多的证据。

**2、独立审查：**根据您举报的主题，如果投诉的类型和严重性需要一项联合调查，公司将会分配职责展开调查。此调查将会由法律及合规部门牵头或负责。

**3、审慎调查：**公司将会以一贯和保密的方式进行调查—在需要了解的基础上。如有必要，合规负责人可采取多种形式进行调查，包括和相关员工、合同方或者包括被指控者在内的任何其他相关人员进行保密约谈。

**4、案件终结并向举报人回复：**一旦收集到充分的信息，公司将会做出决定并且开展随后的步骤，举报人也将会收到来自公司的回复。

请注意，当您使用合规举报系统时应遵循以下规则：

#### **公开和匿名举报**

通常情况下，公司推荐实名公开举报，鼓励您留下您的姓名和具体联系方式。但是，您也可以选择匿名，但是匿名举报可能无助于我们的跟进行动，特别是在进行调查时。

#### **不报复承诺**

公司绝不容忍对举报者的任何形式的报复行为。任何员工，如果企图报复善意举报的人员，将面临公司的纪律处分，包括可能解除劳动合同。

#### **善意举报**

举报不合规行为时很重要且值得尊敬的一点是，举报须本着善意。与此相对，公司不接受任何恶意举报同事的行为。故意诬告他人的员工将面临公司的纪律处分，包括可能解除劳动合同。



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### **保密性**

对不合规行为的举报将作保密处理，只有为处理举报而需要知晓的人员才会被告知举报的存在、举报的细节、以及被举报人员的身份。如果举报人选择匿名举报，公司将不会尝试查明其身份。

### **被举报者的权利**

被举报不合规的员工将被视为清白，除非且直至调查证明其有过错。如果已经开始调查，被举报的员工有权知晓举报和其性质。但是，如果且只有存在证据灭失的严重风险或妨碍调查的情况，可以暂时不通知员工。



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## One Reporting System in Nestlé Greater China Region

Nestlé's reputation lies on its commitment to integrity, honesty, fair dealing and compliance with all applicable laws. Compliance has always been and will remain the foundation of how we do business. In an effort to help employees and/or external stakeholders share Nestlé's commitment to foster a strong and non-compromising compliance culture, Nestlé GCR combines IRS and Tell-Ups into One Reporting System that continues to be operated by an independent third party. It facilitates communication between employees/external stakeholders and the Company on a confidential basis, and enables employees/external stakeholders to report potential legal, regulatory or ethical misconducts in a comfortable and protected environment.

This System applies to external stakeholders and all Business Units, Functional units, Globally and Regionally Managed Businesses, and site operations within Nestlé Greater China Region (GCR), including NCL Head-office, all OCs, R&D Centers, China Specific Business Unites, all branches of the above entities, and all future legal entities to be incorporated their branches.

Reports that contain non-compliance concern allegations on one of the 11 sensitive categories will be escalated to the Group Chief Compliance Officer and to AOA Zone Head of Legal and Compliance.

- Abuse of Power and/or Mobbing/Bullying
- Antitrust and Fair Dealing
- Bribery and Corruption
- Confidential Information, Privacy Policy (Data Privacy, trade secrets, Intellectual property)
- Discrimination and Violence
- Executive board members/senior managers in Switzerland
- Fraud (misappropriation or misconduct on accounting/financial statement)
- Human Rights (Child labor, forced labor and modern slavery)
- Management Committee Members related
- Non-Compliance against WHO Code (International Code of Marketing of Breastmilk Substitutes)
- Sexual Harassment

Employees/external stakeholders can use the following ways to report alleged misconducts:

1. Use of One Reporting System Hotline:

The One Reporting System Hotline is available at any time (24/7) and is free of charge.

Free telephone number: 108007440179 (China Mainland Netcom)

108004400179 (China Mainland Telecom)

800963161 (Hong Kong)

00801444317 (Taiwan)



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## 2. Use of One Reporting System Website:

Website: [www.speakupfeedback.eu/web/A2VY73/cn](http://www.speakupfeedback.eu/web/A2VY73/cn) (China Mainland)  
[www.speakupfeedback.eu/web/A2VY73/hk](http://www.speakupfeedback.eu/web/A2VY73/hk) (Hong Kong)  
[www.speakupfeedback.eu/web/A2VY73/tw](http://www.speakupfeedback.eu/web/A2VY73/tw) (Taiwan)

Once you have entered the One Reporting System Hotline or Website, you will have to provide the below access codes:

81729 (China Mainland)  
14764 (Hong Kong)  
97363 (Taiwan)

After you have provided the access code, you will receive your individual case number. The case number is your personal key to the One Reporting System. It allows you to track the progress of the case and to leave additional information. The next time you access the system, you will be asked for this number. Therefore, please write it down and keep it in a secured place.

Once you have received your personal case number, you may report your concern. In the very beginning of the journey, please select misconduct category as per your allegation. If you use the phone, please be aware that you will not speak to an operator. Instead, you will leave a voice message which will be recorded. Should you use the Website, you can attach document.

Your report or, in case you use the Hotline, the transcript of your voice message will be forwarded to the Compliance Officer in Nestlé GCR. The Company takes your concern very seriously and will take appropriate action. Within approximately one week, a first response and possibly follow-up questions will be waiting for you. Simply go to the One Reporting System Hotline or Website, log in with your case number and review the response.

In the meantime, we would depict the following steps taken by the company to manage concerns and complaints, so that all employees/external stakeholders can know how this system works.

**1. ACKNOWLEDGEMENT:** Upon receiving the message, the company (Legal & Compliance Dept.) will reply to you by acknowledging the receipt of your report within five working days in general. If the information provided by your first report is not sufficiently evidenced, the company may contact you and ask for more evidence.

**2. INDEPENDENT OWNER REVIEW:** According to the subjects of your report, the company will assign responsibility for the investigation if warranted based on the type and severity of the allegation for a joint investigation. The investigation will be led or handled by Legal & Compliance Dept.

**3. INVESTIGATE WITH DUE DISCRETION:** The company will conduct an investigation in a consistent and confidential manner – on a need to know basis. When necessary, the Compliance Officer may initiate various processes including confidential interviews with relevant employees, contractors or anybody else relevant including the alleged person.

**4. CLOSE THE CASE AND REPLY TO YOU:** As soon as sufficient information has been collected, a



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decision and the follow up steps will be agreed by the Company and you will receive a reply from the Company.

Please be aware that the below principles shall be applied when you use the One Reporting System:

**Open and anonymous reporting**

Under regular circumstances, open reports are recommended, we encourage you to leave your name and contact details. However, you may choose to remain anonymous, but anonymous report may not help our follow-up actions, in particular investigations.

**Non-retaliation commitment**

Retaliation of any type against a Complainant will not be tolerated by the Company. Anyone who attempts to retaliate against the one for reporting in good faith may face disciplinary action, including the possibility of dismissal.

**Good faith complaints only**

Reporting of non-compliance in good faith is important and honorable. By contrast, filling a report against a co-employee in bad faith is unacceptable. Employees who intentionally make false allegations against others may face disciplinary action, including the possibility of dismissal.

**Confidentiality**

Non-compliance reports will be dealt with confidentially. The fact that a report has been filed, the particulars of the report as well as the identity of the incriminated employee will be shared only with those who need to know for purposes of handling the complaint. In case the complainant chooses to make an anonymous report, the Company will not try to find out his identity.

**Rights of the Accused**

The employee incriminated in the non-compliance report will be deemed innocent unless and until the investigation proves otherwise. If an investigation has been initiated, the accused employee has a right to be informed of the complaint and its nature. The notification can, however, be suspended if and as long as otherwise there is a serious risk of destruction of evidence or impediment to the investigation.