

Brambles

Group Guidelines for Serious Incident Reporting Policy

Brambles Limited

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Version 2.0

GROUP GUIDELINES FOR SERIOUS INCIDENT REPORTING

Responsibility for managing serious incidents rests with those managers closest to the problem. However, should any occurrence arise that has the potential to result in significant adverse consequences to people, property or the reputation of Brambles as a responsible corporate citizen, this needs to be communicated to senior management in order to mobilise the right resources to deal with the problem.

To this end, a serious incident is one that involves (or even just had the potential to involve) one or more of the following:

- Fatality amongst workforce, contractors or the public;
- Incidents resulting in (or potentially resulting in) serious environmental damage;
- Actual or attempted circumvention of accounting policies, internal accounting controls, or auditing matters, including fraud or deliberate error in the preparation, evaluation, review, or audit of Brambles' financial records or misrepresentations or false statements about matters contained in the Brambles' financial records, financial reports, or audit reports;
- Actual or potential illegal acts or fraud or conflicts of interest;
- Actual or potential violations of the US Foreign Corrupt Practices Act, the UK Bribery Act, or any other anti-bribery or corruption-related law;
- A dawn raid or other enquiry by a regulator or local law enforcement agency; and
- Incidents resulting in (or potentially resulting in) significant adverse media or public attention, criminal prosecution or major litigation, significant operational downtime, or property damage or financial liability (after insurance) in excess of GBP 400,000; USD 500,000; AUD 1,000,000; or Euro 600,000.

All such incidents should be communicated to the **executive responsible for the site**, who will inform your **Business President/CEO** and the following people:

- Group Controller
- Group Vice President, Internal Audit and Risk
- Head of Legal and Group Company Secretary

Upon learning of a serious incident, the Head of Legal shall notify and advise Brambles' Chief Executive Officer and the remaining members of the Executive Leadership Team, as appropriate.

The Brambles' Board has overall responsibility for these Guidelines.

The Head of Legal and Group Company Secretary will review these Guidelines from a legal and operational perspective at least one a year and should ensure that all employees receive regular and appropriate training.

All employees are responsible for the success of these Guidelines. Brambles creates workplaces in which open and honest communications among all employees are valued and respected. If you have any questions about these Guidelines, or if you would like to report a potential violation of them, please speak to your line manager, any member of the Legal or Human Resources Teams, or the Speak Up Hotline. Consistent with Brambles' Speak Up Policy, no reprisal or retribution will be taken against any employee for raising concerns under these Guidelines. Brambles is committed to investigating, addressing, and responding to concerns of employees and to taking appropriate corrective action in response to any violation.