

Whistleblowing Policy

Purpose

Etac is a global company with strong ethical values, that emphasises the importance of doing business in a way that generates long-term value and trust.

Our employee Code of Conduct and Supplier Code of Conduct set out the standard of professional conduct that we expect of employees and business partners in our interactions with people, society and the environment around us.

The purpose of this whistleblowing policy is to encourage stakeholders to report suspected illegal, unethical, or improper conduct related to Etac, ensuring a responsible and fair investigation, protection for the whistleblower, and appropriate corrective actions, remediation, and follow-up in the event of a confirmed breach of the law, regulations, our Codes of Conduct and/or policies.

Scope

This policy applies to all Etac stakeholders. Everyone with an interest in how we do business should be able to trust that if they report suspected misconduct, it will be handled in a timely, responsible and fair manner.

Responsibilities

- **Board of Directors:** Ultimately responsible for ensuring policies for responsible business conduct and oversight of misconduct cases.
- **Audit Committee:** Oversight of the whistleblower program, including review of misconduct reports and oversight of procedures and internal controls.
- **Group CEO:** Ultimately responsible for ensuring employees understand their role in maintaining Etac's culture of responsible business conduct and ensuring corrective actions are taken, including remediation where appropriate.
- **Group Management:** Responsible for cascading Etac's policies and processes for responsible business conduct, including the Code of Conduct Compliance Procedure and Misconduct Investigation Procedure.
- **Managers:** Responsible for investigating reports of suspected misconduct in a timely, responsible, and fair manner, and involving HR in accordance with our Misconduct Investigation Procedure.
- **HR/Local person responsible for HR data:** Responsible for supporting investigations and maintaining records of misconduct cases for compliance and/or learning purposes. Local HR managers (or local HR data responsible) are also responsible for reporting records to Group HR and escalating serious cases to Group level.
- **Employees:** Responsible for reading, signing and complying with the Code of Conduct, participating in Code of Conduct trainings, and reporting suspected violations.

Reporting misconduct / Whistleblowing

Reports of suspected misconduct help Etac to prevent, minimise and promptly address potential adverse impacts on people, society or the environment.

Any stakeholder who suspects a violation of laws and regulations, our Codes of Conduct, and/or policies is expected and encouraged to report their concerns.

Examples of misconduct that should be reported include:

- Corruption, including bribery and fraud
- Conflicts of interest or abuse of power
- Violations of competition law
- Violations of data protection regulations

- Abuse of human rights, including labour rights
- Discrimination and harassment
- Environmental crimes
- Violations of tax laws
- Breaches of internal controls or financial reporting obligations
- Behaviour that could cause harm to the company, its employees, or stakeholders
- Other legal violations or breaches of our Codes of Conduct

Note:

- Employees who have questions or concerns regarding routine workplace matters should contact their manager or local HR.
- Stakeholders who have questions or concerns regarding delivery, services or similar matters should contact Customer Service.

How to report?

A report can be made to any of our managers, HR or through the whistleblowing channel. Employees are encouraged to report suspected misconduct first and foremost to a manager or HR. Stakeholders who do not feel comfortable reporting suspected misconduct to a manager or HR may use the misconduct reporting channel, WhistleB. While proof of suspected misconduct is not required, all reports must be made in good faith.

The whistleblowing channel, WhistleB, is encrypted, password protected and provided by an external partner. All communication through the channel is kept confidential, except as may be reasonably necessary under the circumstances to facilitate an investigation, take remedial action, or comply with applicable law, and the person making a report may choose to remain anonymous in the subsequent dialogue in the channel. Link to WhistleB: <https://report.whistleb.com/en/etac>

Reporting to a manager

Managers who receive reports of suspected misconduct are expected to promptly, responsibly, fairly, and confidentially (to the extent practical and appropriate), investigate the matter, and involve HR as per our Misconduct Investigation Procedure.

If a reporter of suspected misconduct feels their case was not handled fairly or appropriately, they can escalate the issue by reporting it to the whistleblowing channel, WhistleB.

Reporting through the whistleblowing channel

Reports that are received through the whistleblowing channel are investigated by Etac's whistleblowing team which consists of the Group CEO, Group CFO and Group Chief HR Officer.

To safeguard the whistleblowing channel, all reported messages through WhistleB are reviewed by Etac's audit committee, which includes the Chairman of the Board of Directors and Etac's external auditor.

Link to WhistleB: <https://report.whistleb.com/en/etac>

Non-retaliation

Everyone should feel safe when raising concerns about how we conduct business, including adverse impacts in our value chain. Etac does not tolerate retaliation in any form against those who report suspected misconduct in good faith or otherwise cooperate in an investigation into suspected misconduct. Retaliation can include termination, reduction of salary or benefits, changes in the work schedule, transfers, and denial of a promotion or a raise.

Investigation procedure

Misconduct case investigations are conducted in line with our Misconduct Investigation Procedure. The following principles apply in all investigations, regardless of whether it is reported directly to a manager, local HR or through the whistleblowing channel.

- Etac does not tolerate retaliation in any form against those who report suspected misconduct in good faith or otherwise cooperate in an investigation into suspected misconduct.
- A person subject to an investigation of alleged misconduct is also entitled to protection. The presumption of innocence is a leading principle.
- Information disclosed during the course of the investigation will, to the extent practical and appropriate, remain confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law.
- Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a whistleblower will be kept informed of the outcome of the investigation.
- Etac will involve local law enforcement in investigations when necessary.
- In cases of alleged criminal offences, the whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

Corrective actions and remediation

If a case is shown to have been a breach of the law, regulations, our Codes of Conduct and/or policies, we will take appropriate corrective action based on the nature and impact of the breach. A breach can result in employee discipline, including dismissal, termination of a supplier relationship, and/or legal action. If Etac has caused or contributed to an actual adverse impact, we will, where appropriate, reasonably provide for or cooperate in its remediation.

Follow-up

Follow-up is part of our work to safeguard that we maintain a responsible and ethical company culture founded on openness, trust and accountability. While case records will be handled in line with privacy policies, lessons learned from confirmed cases will be shared if they can help the organisation improve and maintain a responsible culture.

Etac will also follow up with affected stakeholders on the effectiveness of corrective actions and/or remediation.

Privacy

Any personal data obtained as part of any report and investigation (including of the person speaking up, any person under investigation, and any witnesses) will only be used by Etac for the investigation and in accordance with relevant data protection laws and our privacy policies.

Outside reporting

This policy provides a mechanism for Etac to be made aware of any suspected misconduct and address the suspected misconduct as soon as possible. However, nothing in this policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to Etac through any reporting method specified in this policy.

Revision

Etac's Group Management may, in consultation with the Board of Directors, amend this policy at any time in a manner consistent with applicable laws and regulations.

Related documents

- Code of Conduct
- Supplier Code of Conduct
- Misconduct Investigation Procedure
- Code of Conduct Compliance Procedure

Questions about this policy can be addressed to: sustainability@etac.com