



Whistleblowing Guideline

Group Compliance

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1. Purpose of this Guideline

Receiving information from Avolta team members and third parties (customers, suppliers etc.) about possible mistreatment, malpractice or wrongdoing is essential to protect Avolta’s values, close gaps, improve processes and avoid violations of laws and regulations. The foundation of our whistleblowing approach is to act in good faith in order to resolve a situation.

This Guideline:

- **Supports** team members and third parties on how to make a report related to Avolta.
- Helps to ensure that reports are handled in a **fair and non-discriminatory manner** (see Principles in no. 4).
- Helps to ensure that reports are handled **in compliance with related laws** (e.g. laws which are issued based on the EU Whistleblower Directive and all other applicable laws).

2. What sort of reports can be raised?

Any individual occurrence or generalized practice that is detrimental to Avolta or its team members and which could cause personal grievance, financial loss or reputational damage, including, but not limited to, the following:

- Violations of the Avolta Code of Conduct (including unfair competition, bribery, fraud, conflict of interest, breach of confidentiality etc.)
- Violations of applicable laws or regulations on personal safety and health at work
- Inappropriate workplace behavior
- Discrimination, (sexual) harassment and/or bullying of any kind
- Retaliation
- Violations of applicable laws or regulations on food safety & quality
- Violations of Avolta’s Environment – Social – Governance (ESG) values

- Violations of human rights, human trafficking, forced labor, child labor
- Violations of applicable laws or regulations on data protection
- Other issues which may be in violation of applicable laws or regulations

3. Why should I speak up?

Speaking up in good faith is appreciated as it has several benefits:

- Ensures that the **Avolta Code of Conduct** is followed in daily business life.
- **Early reporting** may prevent an intention or a practice from resulting in a violation of the Code of Conduct and/or applicable laws.
- **Avoids business disruption** which often results from serious violations.
- Helps Avolta to be a **reliable business partner** for all stakeholders.
- Reduces / eliminates **risk exposures**.
- Allows for **corrections and remedial action** in the presence of violations or wrongdoing

4. Guiding Principles

The handling of reports is often complex and requires a high level of sensitivity by all persons involved. The following Principles are applied:

- **Presumption of innocence:** alleged perpetrators are considered innocent until established otherwise.
- **Inclusion, no harassment/bullying:** the whistleblowing channels may not be used with the intent to disparage or malign individuals by knowingly making false accusations. This in itself may be considered harassment or bullying and result in disciplinary measures.
- **No retaliation against reporting persons:** Avolta has a retaliation-free whistleblowing policy. Reporting persons must not suffer any detrimental treatment as a result of raising in good faith a Report. (See details in no. 11).
- **Confidentiality:** Reporting Persons may report anonymously or request that their identity not be revealed to other persons involved in the investigation. Confidentiality shall be ensured by all persons involved in the speak-up process. (See details in no. 10).
- **Transparency:** people accused of wrongdoing shall be informed of the investigation and the allegations raised against them. They shall be given the possibility to tell their view of the issue ("Right to be heard"). However, the name of the person who has made the report will not be shared if the Reporting Person asked for confidentiality.
- **Cooperation:** various functions shall cooperate together, clarifying issues in the best interest of Avolta and its team members to prevent damage, minimize risk exposures and to improve control measures.

5. Who can be a Reporting Person?

Avolta encourages everyone to help avoid harm to others or to Avolta and reduce / eliminate risk exposures. "Reporting Persons" include:

- Team members, at all levels of Avolta's organization and with all types of contracts (full-time, part-time, employed through an agency etc.), including former team members.
- Business partners, such as agents, consultants, suppliers, subcontractors, joint venture partners etc.

- Customers, competitors or any other market participants

6. How can reports be voiced (“the Channels”)

Reporting Persons have several options of voicing their reports, both locally and on group level:

The recommended Channel to report is Avolta`s **OpenLine**: avolta.ethicspoint.com or the toll free hotline numbers:

Country	Hotline number
Argentina	0800-345-2606
Brazil	0800 762 0090
China	4001200436
France	0800 90 29 52
Germany	0800 181 9691
Greece	8006000615
Italy (includes San Marino, Vatican City)	800819540
Mexico	8008801738
Slovenia	080 083162
Spain	900751410
UK	0800 088 5394
Switzerland	8558284052
Belgium	8558284052
Australia	1800 517 424
Denmark	80 83 00 74
Finland	0800 413609
India	000 800 0502 035
Indonesia	007-803-321-2337
Ireland	1800 903 376
Maldives	5035307000
Malaysia	1-800-81-2893
New Zealand	0800 527 513
Norway	800 62 328
Sweden	020-88 85 76
Netherlands	8000200162
Turkey	8558284052
United Arab Emirates	800 035704527

Reporting Persons may also use any of the additional Channels listed here below:

- **Local (any of the following):**
 - Local Compliance Ambassador
 - Local Legal & Compliance Department member, if any
 - Local HR Department member, if any
- **On Group level (any of the following):**
 - Compliance@avolta.net
 - Regional Compliance Officer
 - Regional HR Manager

7. Who is normally involved in the handling of a report (“Case Managers”)?

Reports voiced over Avolta’s **OpenLine or the Hotline numbers** are assigned to the following **Case Managers**:

- by default the report is assigned on “global level” to the **Global Compliance Team***
- **in the EU**: the Reporting Persons can chose whether their report is handled on “local” or on “global level” if it involves an European Avolta entity with more than 250 team members. If “local level” is chosen, the report is assigned to the relevant Local Compliance Ambassador.
- The Case Manager may involve **other relevant persons/functions** depending on the content of the report.

* Exceptions apply to North America & Canada

8. Can a report be submitted anonymously?

When using **OpenLine or the hotline numbers** the Reporting Persons can choose whether they want to disclose their identity or report anonymously, unless locally prohibited by law.

- Even if they chose to remain anonymous, they can communicate with the Case Managers.
- Below is the process of how anonymous reporting works:
 - when submitting a report through OpenLine or calling the hotline, the Reporting Persons are asked to choose a password and are provided with a report key.
 - the Reporting Persons can use the password and the report key to keep in touch and retrieve feedback regarding their report by either accessing the OpenLine website or calling the hotline numbers.

9. How is a report handled?

Persons involved in the handling of reports are specifically trained. The process normally includes the following steps:

- **Confirmation of receipt** to Reporting Person as soon as possible, **at the latest within 7 working days**.
- Identification of persons to be involved / triage.
- Evaluation of whether the report is voiced in good faith.
- Initiation of immediate measures, if needed.
- In serious cases: notification of senior management.
- Investigation of report, if needed.
- People accused of wrongdoing are given the possibility to provide feedback (“Right to be heard”).
- Final report with a conclusion including identified corrective actions.
- **Answer to Reporting Person as soon as possible**, at the latest within 3 months after having received the report. If an evaluation takes longer than 1 month, the Reporting Person will receive an interim answer.

10. Will my identity be kept confidential?

Avolta's whistleblowing Channels ensure confidentiality of the identity of the Reporting Person to the maximum extent permitted by law. Access by non-authorized persons to the report and its investigation is prevented. Furthermore, Reporting Persons shall **never be forced** or requested to reveal their identity and can always **refuse to answer questions** which they feel could reveal their identity.

11. Am I protected against retaliation when speaking up ("Whistleblower Protection")?

Speaking up is encouraged and any person reporting potential misconduct is protected from retaliation. Reporting Persons must not suffer any detrimental treatment as a result of raising a report in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment including harassment on the job or workplace bullying.

The following principles apply:

- **Retaliation** of persons who speak up in good faith is **subject to disciplinary action**.
- Also persons **who support** colleagues who raised a report in good faith are protected against retaliation
- The protection **not only applies if a report is voiced through a specific Channel**, but also if mentioned in a meeting etc.
- The Whistleblower Protection shall not be misused. For example, there shall be no Whistleblower Protection in case a report is raised in good faith to try to avoid dismissal or disciplinary actions for wrongdoing of the Reporting Person.

12. What are my duties when speaking up?

- **Act in good faith.** In other words, do not knowingly share false information via the whistleblowing Channels as a means of harming someone's reputation or use the Channels to settle a personal dispute.
- A report must be reported **truthfully and in a complete manner without omitting relevant facts, according to the best knowledge available**.
- **Respect the confidentiality** of the investigation and **do not damage the reputation of someone** who may be exonerated by the investigation when all facts are known.

Speak up **as soon as possible** so that a potential misconduct or the escalation of a situation might still be prevented and don't start investigating the matter yourself.

13. Data Protection

The handling of reports often involves the processing of personal data related to several data subjects. Avolta ensures that all such data processing is compliant with Avolta's Data Privacy Policy and applicable laws.

If you have questions about this Guideline, please contact the Legal & Compliance Department at compliance@avolta.net. Thanks for your support.