

Document Title:	Whistleblowing Policy
Document Reference:	HR_013_Whistle Blowing.doc
Document Number:	013
Author:	Jane Beeston
Version:	1
Date last saved:	26 September 2019

DISTRIBUTION LIST:

Leadership level 3 to 5 (accountability for ensuring alignment across teams)
Intranet (for communication)
Splash (for automated signature all employees)
EthicsPoint Portal <http://www.colart.ethicspoint.com>

TABLE OF CONTENTS

- 1. ABOUT THIS POLICY 3
- 2. OUR COMMITMENT 3
- 3. RESPONSIBILITY FOR THE POLICY 3
- 4. SCOPE OF WHISTLEBLOWING 3
- 5. RAISING A WHISTLEBLOWING CONCERN 4
- 6. CONFIDENTIALITY 5
- 7. INVESTIGATION AND OUTCOME 5
- 8. IF YOU ARE NOT SATISFIED 6
- 9. EXTERNAL DISCLOSURES 6
- 10. PROTECTION FROM REPERCUSSIONS FOR WHISTLEBLOWERS 6
- 11. KEY CONTACTS 7

1. ABOUT THIS POLICY

The Colart Group (the “**Company**”, “**Colart**”, “**We/Us/Our**”) is committed to conducting our business with honesty and integrity, and we expect all our people to maintain high standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

This policy applies to all employees, officers, consultants, contractors, volunteers, interns, trainees, casual workers and agency workers (collectively, “**employees**”).

This policy does not form part of any employee’s contract of employment and we may amend it at any time.

2. OUR COMMITMENT

Through this policy we are committed to the following aims:

- i) To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- ii) To provide employees with guidance as to how to raise those concerns; and
- iii) To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

3. RESPONSIBILITY FOR THE POLICY

The Board of Directors of Colart has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Local HR Business Partner has day-to-day operational responsibility for this policy and must ensure that all managers and other employees who may deal with concerns or investigations under this policy receive regular and appropriate training.

The Chief People Officer should review this policy from a legal and operational perspective at least once a year.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any concerns.

4. SCOPE OF WHISTLEBLOWING

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- i) criminal activity;
- ii) failure to comply with any legal or regulatory requirements or professional obligation;

- iii) danger to health and safety;
- iv) damage to the environment;
- v) bribery and corruption under our Code of Conduct;
- vi) facilitating tax evasion or money laundering;
- vii) financial fraud, theft or mismanagement;
- viii) breach of our internal policies and procedures including our Code of Conduct;
- ix) conduct likely to damage our reputation or financial wellbeing (such as the use of drugs);
- x) unauthorised disclosure of confidential information;
- xi) negligence;
- xii) data protection breaches;
- xiii) conflicts of interest under our Code of Conduct;
- xiv) giving or receiving gifts and/or hospitality in breach of our Code of Conduct;
- xv) breach of anti-trust and fair competition obligations under our Code of Conduct;
- xvi) discrimination;
- xvii) sexual or psychological harassment; and
- xviii) the deliberate concealment of any of the above matters.

A “**Whistleblower**” is a person who raises a genuine concern relating to any of the disclosures under this Paragraph 4. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a “**Whistleblowing Concern**”) you should report it under this policy.

The examples under this Paragraph 4 is not an exhaustive list. If you are uncertain whether something is within the scope of this policy you should seek advice from your Local HR Business Partner, whose contact details are at the end of this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In such cases, you should use the Company’s Grievance Procedure.

5. RAISING A WHISTLEBLOWING CONCERN

In line with the Company’s value for *openness*, it is hoped that in many cases you will be able to raise any Whistleblowing Concerns directly and openly with your line manager or your Local HR Business Partner. You may tell them in person or if your prefer, put the matter in writing. They may be able to agree a way of resolving your Whistleblowing Concern quickly and effectively. In some cases, they may refer the matter to the Chief People Officer.

However, where the matter is more serious, or you feel that your line manager or your Local HR Business Partner has not addressed your Whistleblowing Concerns, or you prefer not to raise it with them for any reason, you should contact one of the following:

- a) The Chief People Officer; or
- b) Our external whistleblowing portal <http://www.colart.ethicspoint.com>; or
- c) The Group Chief Executive Officer; or
- d) The Group Chief Financial Officer; or
- e) The Group General Counsel.

All contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your Whistleblowing Concerns. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will create a written summary of your Whistleblowing Concerns and may provide you with a copy after the meeting. We also aim to give you an indication of how we propose to deal with the matter.

6. CONFIDENTIALITY

We hope that employees will feel able to voice Whistleblowing Concerns openly under this policy though we recognise that by reporting a Whistleblowing Concern at work you may worry that you will be opening yourself up to victimisation or risking your job security. The Company's strong commitment to this policy means you can raise Whistleblowing Concerns and be sure that you will be supported and protected from repercussions. Provided you have a reasonable belief that wrongdoing or dangers at work are occurring or are likely to occur, it does not matter if you are mistaken. There is no question of you having to prove anything. If you want to raise your Whistleblowing Concerns confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your Whistleblowing Concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to your Local HR Business Partner or one of the other contact points listed in Paragraph 5 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from EthicsPoint (our whistleblowing portal). All contact details are at the end of this policy.

However, if after considering the above commitments, you still want to raise your Whistleblowing Concerns anonymously, then EthicsPoint (the external whistleblowing portal) has the facility to raise anonymous reports.

7. INVESTIGATION AND OUTCOME

Once you have raised a Whistleblowing Concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment either directly or via the EthicsPoint portal. You may be required to attend additional meetings in order to provide

further information.

In some cases we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

Employees should not pursue their own investigations, however well-intended, as flawed or improper investigation could compromise the Company's ability to take effective remedial or disciplinary action.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that an employee has made false allegations maliciously, the employee will be subject to disciplinary action under the Company's Disciplinary Procedure.

8. IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you are seeking, we will try to deal with your Whistleblowing Concerns fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your Whistleblowing Concern has been handled, you can raise it with one of the other key contacts in Paragraph 5. All contact details are set out at the end of this policy.

9. EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing or dangers in the workplace. In most cases, you should not find it necessary to alert anyone externally.

We strongly encourage you to seek advice before reporting a Whistleblowing Concern to anyone external. It will very rarely, if ever, be appropriate to alert the media.

Whistleblowing Concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier, service provider or consumer. We encourage you to report such Whistleblowing Concerns internally first. You should contact your line manager or Local HR Business Partner or one of the other individuals set out in Paragraph 5 for guidance.

10. PROTECTION FROM REPERCUSSIONS FOR WHISTLEBLOWERS

Whistleblowers must not suffer any detrimental treatment as a result of raising a Whistleblowing Concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment or victimisation connected with raising a Whistleblowing Concern. If you believe that you have suffered any such treatment, you should inform your Local HR Business Partner immediately. If the matter is not remedied, you should raise it formally using the Company's Grievance Procedure.

Employees must not threaten or retaliate against Whistleblowers in any way. Any employee involved

in such conduct will be subject to disciplinary action under the Company's Disciplinary Procedure.

11. KEY CONTACTS

Your Local HR Business Partner	people@colart.com
Chief People Officer	Jane Beeston J.Beeston@colart.com
Chief Executive Officer or Chief Financial Officer	Dennis van Schie or Jonathan Spight D.vanSchie@colart.com or J.Spight@colart.com
Group General Counsel	Sarwar Zaman sarwar.zaman@colart.com
EthicsPoint (Available 24 hours a day, 365 days a year)	Website: http://www.colart.ethicspoint.com For USA Call Centre: +1 855-866-4018 For Call Centre for all other countries, follow these <u>2 steps</u> : <u>Step 1</u> <ul style="list-style-type: none"> • UK Call: 0-800-89-0011 • France Call: 0-800-99-0011 • Germany Call: 0-800-225-5288 • Netherlands Call: 0-800-022-9111 • Italy Call: 800-172-444 • Spain Call: 900-99-0011 • Sweden Call: 020-799-111 • Poland Call: 0-0-800-111-1111 • China (Southern) Call: 10-811 • China (Northern) Call: 108-888

Step 2

- When English is the prompted language, dial 855-866-4018

[ENDS]