

What types of issues can I report through the Whistleblower Hotline?

You may use the Whistleblower Hotline to report serious allegations of:

Compliance:

- Conflicts of interest
- Bribery and facilitation payments
- Contract issues (non-compliant, forged documents)
- Gifts and hospitality in breach of FLSmith's policies, including [FLSmith's Group Travel Procedure](#)
- Leaking of proprietary information and misuse of FLSmith's Intellectual Property (IP) rights
- Violations of trade sanctions and embargoes
- Violations of human rights
- Violations of competition law
- Violations of FLSmith's [Donations Sub-Policy](#)
- Extortion
- Violations of General Data Protection Regulation (GDPR) and other data breaches
- Breaches of confidentiality (information obtained during internal investigations, breaches of Non-Disclosure Agreements (NDAs))
- Retaliation because of reporting irregularities or participating in internal investigations

Finance:

- Asset misappropriation
- Violations of FLSmith's policies regarding expense reimbursement
- Billing schemes (procurement fraud, self-approval, shell company, supplier collusion, non-compliance with procurement procedures)
- Tax issues
- Falsification of financial records or financial statements
- Cyber security (fraudulent emails)
- Payroll scheme (falsified attendance or time off, ghost employee)
- Check tampering
- Money laundering
- Terrorist financing

Human Resources:

- Discrimination
- Harassment
- Other employee-related issues (unfair dismissals or hiring procedures)

Other:

- Violations of health and safety procedures
- Environmental issues
- Breaches of any international or local regulations or laws relevant to FLSmith's business operations
- Breaches of any other FLSmith policy or procedures

DO NOT report non-criminal or personal concerns about wages, bonuses, career advancement, general team dynamics or department issues, etc. Discuss such issues with your leader or People (HR) manager instead.

Why do we use a third party to handle reports?

The third-party website provides an advanced encryption system which makes it completely impossible to track reporters, including IP addresses used. They are also able to receive reports 24 hours a day, 365 days a year, in many different languages.

Who can report to the Hotline?

The Whistleblower Hotline is open for everyone, both internally and externally.

Will I know if someone files a report against me?

Once we have investigated the matter, we will inform the involved parties of the allegations and the conclusion of the investigation. We will not reveal who submitted the report, even if we know.

The exception is in the case of harassment where we are obliged to inform the subject of the investigation who the alleged victim is.

How is my privacy protected if I am accused?

Only a very limited number of people in FLSmidth are given access to the report and the entire case remains fully confidential. Your name will not be disclosed unless disciplinary action is taken against you or the case is forwarded to law enforcement.

How is my privacy protected if I report through the Hotline?

Only a very limited number of people in FLSmidth are given access to your report and the case is confidential. We will only reveal your identity if you provide explicit consent, even if you choose to state your name. You also have the option to report completely anonymously. All communication submitted through the Whistleblower Hotline is fully encrypted, which protects your identity, including IP addresses.

Who will receive a copy of my report?

Initially, only two parties receive a submitted report: a Compliance Manager and the Investigation and Compliance Specialists. They may then involve others in the investigation, depending on the case. Relevant local managers will only be informed about a report once key facts have been established.

How am I protected against retaliation for having reported?

The [Whistleblower and Internal Investigations Sub-Policy](#) explicitly protects whistleblowers against retaliation in connection with reporting and your name will not be disclosed regardless of whether you have reported anonymously or not. If you believe you are being targeted by colleagues or others because of your report, you should immediately seek support from the [Compliance team](#). Be aware we can only protect whistleblowers whose identity is known to Compliance.

What happens when I file a report?

We assess whether an investigation is needed and proceed with the investigation. You'll always receive confirmation your report has been received and is being assessed for investigation within 7 days of filing a report. From there you will be informed whether your case will be investigated or dropped.

When you file a report through the Whistleblower Hotline, you will receive a report key and password, which you can use at any time to check on your case and add additional information and documentation. If you provide your email address, you can receive email notifications. Of course, if you choose to report anonymously, no one will be able to see your email address.

Who is involved in the investigation of cases?

The Compliance team in Denmark receives all reports from the Whistleblower Hotline. The Compliance Manager and Investigation and Compliance Specialists make an initial screening of the report and decide who will lead the investigation. In any case, the number of people involved

will be kept as low as possible. Relevant managers will only be informed about the case once the key facts of the case are established.

What happens if someone files a false report against me?

You will be informed a case was filed against you and that it was closed and found groundless. You will not be informed who reported the case unless that person wishes to be named. The reporter will be informed about the conclusion. In cases where the reporter has deliberately filed a false case, they may be subject to disciplinary action.

What does FLSmidth do if it is determined that wrongdoing or a crime was committed?

Cases may result in disciplinary action such as warnings, sanctions or dismissals. Criminal cases will be handed over to law enforcement.

What happens if a case is found to be without merit?

Upon review, if a report is found to not have sufficient grounds to pursue action, the case is closed and the accused and reporting parties are informed.

Can I report anonymously?

Yes. We always recommend you provide your name if you feel comfortable doing so as it generally increases our possibilities of properly investigating the allegations. However, there is always the option to remain anonymous.

Can I use a public or personal computer to report?

Yes. You can safely and confidentially use any computer and internet connection to access the Whistleblower Hotline. The third-party provider of the Whistleblower Hotline does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer is available. In fact, they are contractually committed to not pursue a reporter's identity.

Can I submit evidence?

Yes. In fact, submitting evidence and documentation will help create a stronger report. If you have evidence and/or documentation, you can submit it through the Whistleblower Hotline, where it will be encrypted, along with your report for security reasons. You can also send documentation to Compliance by [email](#) (not encrypted).

Can I provide more information to a report at a later stage?

Yes. You will be given a login and password once you've submitted your report. You can use this login to provide further information after you have submitted a report. You can also enter into a dialogue with the investigators, even while remaining fully anonymous.

Do I get information and feedback if I report a case?

Within 7 days of submitting, you will be informed that we have received your report and that the case is being handled. Once the case is closed, we will inform you whether the case was closed as substantiated or not.