

# RÖHM - RULES OF PROCEDURE FOR THE WHISTLEBLOWER SYSTEM

In its own Code of Conduct, Röhm encourages all employees to speak up and report known or suspected violations of laws, rules or regulations. Röhm therefore provides employees and also external third parties with a whistleblower system for reporting compliance risks and violations. The reports can relate to classic compliance issues such as corruption and anti-competitive conduct as well as to violations of human rights and environmental standards. These rules of procedure provide instructions on which issues are to be reported, how they can be reported and how Röhm handles reports.

For questions about the whistleblower system and the applicable procedure, the "Frequently Asked Questions" page of the online whistleblower system, the reporting function of the online whistleblower system or the contact option provided below under "Responsibility" can be used.

## Scope of application

The whistleblower system can be used by any person, regardless of whether the person is a Röhm employee or not.

The person may report actual or potential cases of non-compliance with external or company rules or regulations, including human rights and environmental standards.

The report may relate to the own global organization or a business partner of Röhm, in particular a supplier.

Examples of violations of human rights and environmental standards are:

### Human rights violations:

- Child labor
- Forced labor and slavery
- Working conditions that are hazardous to safety and health
- Disregard for freedom of association
- Discrimination
- Withholding of a decent wage
- Unlawful evictions or the unlawful taking of land
- Unlawful use of private or public security forces
- Pollution of soil, water or air, harmful noise emission or excessive water consumption that may contribute to a violation of human rights

**Environmental standards violations:**

- Use of mercury contrary to the Minamata Convention
- Use of persistent organic pollutants contrary to the Stockholm Convention
- Storage, handling, import and export of hazardous waste contrary to the Basel Convention

**Submitting of reports**

Röhm recommends submitting reports via the online whistleblower system:

**<https://roehm.integrityline.com>**

Reports can be submitted 24/7 in various languages. If desired, whistleblowers can remain completely anonymous. Even if whistleblowers disclose their identity, confidentiality and the protection of personal data are safeguarded.

Whistleblowers are encouraged to set up a Secure Inbox within the online whistleblower system to stay in contact with Röhm after submitting a report.

Alternatively, reports can be made directly to the compliance organization of Röhm via e-mail ([compliance@roehm.com](mailto:compliance@roehm.com)) or phone (Region Americas: +1 973 526 8758 (Regional Compliance Officer); Region Asia: +86 021 6759 1069 (Regional Compliance Officer); Region Europe and Rest of the World: +49 6151 863 7444 (Chief Compliance Officer)).

**Handling of reports**

The handling of all incoming reports follows a process, which is described in general below.

**1. Acknowledgement of receipt**

The whistleblowers will get an acknowledgement of receipt within seven days of receipt of the respective report by Röhm.

**2. Access to reports**

Only the persons responsible for receiving and processing the reports, including carrying out the proceedings ("case handlers"), and the persons supporting them in the performance of these tasks have access to the reports received.

The case handlers document all reports in a permanently retrievable manner in compliance with all applicable confidentiality requirements.

**3. Verification of reports**

The content of the report is then verified by the respective case handler. Depending on the content and the risk category, the further proceeding is determined taking into account the internal compliance process.

To the extent possible and permissible, the case handler will discuss the facts with the whistleblower and will inform the whistleblower, no later than three months after receipt of the report, about the status of the proceedings, i.e. about planned and already taken follow-up measures (including the reasons for them).

At the request of the whistleblower, a personal meeting with the case handler is made possible within a reasonable period of time. With the consent of the whistleblower, the meeting may also take place via video and audio transmission.

#### **4. Preventive and remedial actions**

Preventive and remedial action may be required to resolve reported issues. These will be initiated and followed up by case handlers.

To the extent possible and permissible, the case handler will inform the whistleblower of preventive and remedial actions planned and already taken.

#### **5. Evaluation of the proceedings**

Where appropriate, the case handler may evaluate the course and outcome of the proceedings together with the whistleblower.

#### **6. Duration of the proceedings**

The duration of the proceedings depends largely on the facts of the case and can range from a few days to several months. Röhm pursues the goal of leading the proceedings to a satisfactory solution as efficiently as possible.

### **Protection against reprisals**

Röhm is determined to ensure that whistleblowers acting in good faith are not threatened with or suffer any disadvantage, punishment or other reprisal as a result of their report. Retaliation for making good faith reports will not be tolerated. "Good faith" means that the whistleblower had reasonable grounds to believe, at the time of making the report, that the reported information was true.

For whistleblowers employed by Röhm, this includes protection against dismissal, demotion, suspension, threats, harassment or other discrimination in the workplace.

For the benefit of whistleblowers employed by business partners, Röhm will cooperate with business partners to ensure that whistleblowers enjoy a comparable level of protection.

To protect against reprisals, the case handlers will try to maintain contact with the whistleblowers beyond the conclusion of the proceedings.

### **Responsibility**

The responsibility for the whistleblower system and the conduct of the proceedings lies primarily with the Legal and Compliance organization of Röhm.

For questions about the whistleblower system and the applicable procedure, the "Frequently Asked Questions" page of the online whistleblower system, the reporting function of the online whistleblower system or the following contact can be used:

E-mail: [compliance@roehm.com](mailto:compliance@roehm.com)

Phone: +49 6151 863 7444