



**WHISTLEBLOWING USER GUIDE**



## 1. Introduction

“Integrity Line” was chosen by Siegwerk Druckfarben AG & Co. KGaA (Siegwerk) as an external whistleblowing system to enable employees and other persons to submit (anonymous) reports about (potential) misconduct.

Whistleblowing can help Siegwerk to detect and act on possible misconduct and to protect individuals from harm as well as Siegwerk from financial damage and loss of image. At the same time, Integrity Line records (anonymous) reports of misconduct in a comprehensible, secure process that ensures the best possible protection of the legitimate interests of those involved.

Whistleblowing is only intended for specific categories of violations of law and regulations. For Siegwerk these are specifically the following (not conclusive):

- Violations of laws, such as fraud, corruption, antitrust, money laundering, discrimination, harassment, environmental law
- Breaches of data protection and information security
- Significant violations of Siegwerk’s Code of Ethical Business Conduct or Siegwerk’s policies
- Misconduct (Violation of human rights or environmental standards) in Siegwerk’s **Supply Chain** (separate reporting channel)

Whistleblowing is not intended to address other issues that do not meet the criteria above, such as (not conclusive):

- Labor law conflicts
- Misconduct by colleagues or superiors not related to Siegwerk’s business activities
- Disagreements among colleagues, organizational topics
- Minor violations of internal guidelines (e. g. one-time violation of documentation requirements)

## 2. Questions and Answers

### Who can use Integrity Line to report a (possible) misconduct?

Integrity Line may be contacted by any Siegwerk employee as well as third parties (such as suppliers, customers etc.).

### How can you reach Integrity Line and report a misconduct?

You can reach Integrity Line through the following website:  
<https://www.Siegwerk.com/en/company/corporate-culture/compliance.html>

After you have accessed the website, you can select the category 1) “Report a misconduct” (general

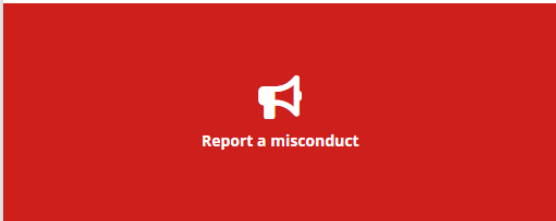
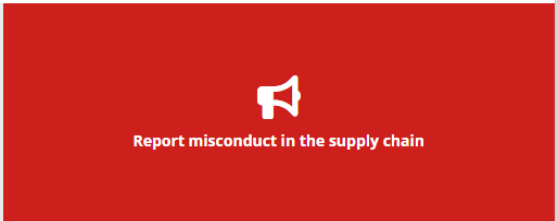
misconduct) or 2) “Report misconduct in the supply chain”. You will then be redirected to a self-explaining questionnaire.

Only some of the questions are mandatory to answer.

Please note: The more detailed your description of the misconduct, the better Siegwirk can categorize and investigate the matter.

### Which type of complaints can you report?

Integrity Line is a confidential channel through which you can report the following:

 <p>Report a <b>“general” misconduct</b> regarding:</p> <ul style="list-style-type: none"><li>▪ Violations of laws, such as fraud, corruption, antitrust, money laundering, discrimination, harassment, environmental law</li><li>▪ Breaches of data protection and information security</li><li>▪ Significant violations of Siegwirk’s Code of Ethical Business Conduct or Siegwirk’s policies</li></ul>	 <p>Report a misconduct (Violation of human rights or environmental standards) in Siegwirk’s <b>Supply Chain</b> against the following principles:</p> <ul style="list-style-type: none"><li>▪ The prohibition of child and forced labor</li><li>▪ The prohibition of all forms of slavery and discrimination</li><li>▪ Forced eviction and the use of security forces if their employments represents a risk to disregard or restriction of human rights</li><li>▪ The strengthening of the freedom of association</li><li>▪ Compliance with occupational health and safety</li><li>▪ The payment of adequate living wages</li><li>▪ Prohibition of environmental pollution</li></ul>
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### Can you remain anonymous?

#### Option 1: Sharing contact details

You can choose to submit the report anonymously, but we encourage you to provide your name and contact details: Sharing contact details has the advantage that Siegwirk can reach out to you in case of further questions related to your complaint. In this case you will receive an e-mail notification and you can again log in to the secure inbox of Integrity Line.

#### Option 2: Remain anonymous

You also have the option to submit your report anonymously. If you want to follow up on the case afterwards or share more information, you can access your case via the secure inbox of Integrity Line



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again. You will receive no notification if Siegwerek wants to reach out to you in case of further questions related to your complaint. You will have to check your Secure Inbox of Integrity Line from time to time.

### How will your report be handled?

#### **Acknowledgement**

If you report a misconduct via Integrity Line, you will get an acknowledgement of receipt.

#### **Investigation/Investigation Team**

An electronic summary of your reporting will only be made available to members of Siegwerek's compliance organization on a strict "need to know basis". These members will review the facts, determine further actions and build a dedicated investigation team, if an investigation is required.

#### **Further communication**

Integrity Line allows for ongoing contact between yourself and the investigation team, if any additional exchange of information is necessary. You will need your password and your Case-ID to log in to Integrity Line and get in contact with Siegwerek's compliance organization.

#### **Result**

We will provide feedback on the result of investigation within a reasonable timeframe.

### How are you protected from retaliation?

Siegwerk will not tolerate any kind of retaliation against anyone who, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated. Any such retaliation is strictly prohibited at Siegwerek. Nevertheless, please consider that reporting should only happen **in good faith**, meaning that we do not accept knowingly submitted false reports, e. g. to deliberately harm other persons or companies.

### Additional reporting channels

#### **General misconduct**

If you want to address a report of misconduct directly to the Group Compliance Officer in Siegburg, Germany, please contact: [Compliance@Siegwerk.com](mailto:Compliance@Siegwerk.com)

If you are a Siegwerek employee: Besides using Integrity Line, you also have the option to discuss any misconduct personally with your direct supervisor, your (local/regional) Human Resources contacts or with your (local/regional) Compliance Representatives. More information can be found on the company's intranet compliance webpage.

#### **Supply Chain related misconduct**

If you want to report a supply chain related misconduct directly to the Human Rights Officer in Siegburg, Germany, please contact: [Humanrights@Siegwerk.com](mailto:Humanrights@Siegwerk.com)