



# **Whistleblowing Policy**



## 1. Introduction

### 1.1. Background

This Whistleblowing Policy (hereinafter: **Policy**) sets out the ethical norms and procedures, standards, and protocols for raising concern about suspected wrongdoing or immoral, unethical behaviour (see also under “What is whistleblowing?”) of all companies belong to PPF Group and all companies in which PPF Group companies hold a majority share, majority voting rights or a direct or indirect controlling influence (hereinafter: **PPF companies or PPF**) essential to their successful and compliant operations, both within and outside PPF companies.

At PPF we are highly committed to conducting our business with honesty and integrity and guide and expect all employees and suppliers to maintain high standards in accordance with our policies and procedures. However, such occurrence cannot be ruled out as all organisations face the potential risk of possible wrongdoing and misconduct from time to time, or of unknowingly harbouring illegal or unethical conduct. We at PPF believe that a culture of openness and accountability is essential in order to prevent such situations from occurring or should they do occur, to address them appropriately.

PPF aims with this Policy

- to encourage colleagues and any other person to raise a concern about suspected wrongdoing immediately when experienced, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected
- to provide employees and any other person with guidance as to in what ways and in the sphere of what processes to raise their possible concerns
- to reassure all PPF company employees and staff in general that they can expect to be able to raise genuine concerns without fear of reprisals, even if the concern is found to be mistaken
- to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing within the organisation by reporting potential wrongdoing via either verbally to the line manager, via a physical box (within the current idea box system to protect confidential handling), via email address [compliance@ppfeurope.com](mailto:compliance@ppfeurope.com) or via whistleblowing reporting system on [www.ppfeurope.com](http://www.ppfeurope.com) webpage.

### 1.2. Applicability

#### **Who does this Policy apply to?**

The present Policy applies to all employees and persons carrying out work for PPF or PPF companies in any PPF country and to anyone who is in touch with PPF, including

- All employees, former employees, applicants for job offers
- Contractors, sub-contractors, suppliers
- Agency/temporary staff members
- Trainees, interns, as the case may be



- Members of local communities.

## **2. Subject of this Policy, Scope, and Protocol**

### **What is whistleblowing?**

Whistleblowing is the disclosure of information that relates to suspected wrongdoing (generally a breach of a legal, statutory or unethical, immoral behaviour). This may include:

- Bribery and corruption, fraud, anti-competitive/anti-trust practices
- Business integrity
- Conflict of interest,
- Discrimination, equal opportunities
- Unethical behaviour, harassment
- Environment, Health and Safety
- Data processing and security
- Human rights

Specific examples include (not an exhaustive list):

- unauthorised disclosure of confidential information
- criminal activity, gross misconduct
- miscarriages of justice
- breach of a legal requirement – e.g. health and safety obligations to be observed by PPF or an individual
- supplying product unfit for consumption
- accidental or intentional release of potentially damaging materials into the environment
- failure to comply with legal or professional obligation or regulatory requirements
- miss-selling or price fixing of products
- product fraud or deliberate non-conformance to product specification in order to benefit the supplier
- mistreatment of workers, illegal personnel procedures
- inappropriate behaviour by representatives or those operating on their behalf.

If PPF employees or any person have genuine and serious concerns related to any of the above, they should report it under this Policy. They can either report it verbally to the line manager or via a physical box (drop in the current suggestion box for confidentiality), e-mail it to [compliance@ppfeurope.com](mailto:compliance@ppfeurope.com), or via whistleblowing reporting system on [www.ppfeurope.com](http://www.ppfeurope.com) webpage.

PPF is committed to ensuring that an individual is not disadvantaged in any way by raising concerns about suspected reportable behaviour, in particular by discrimination, harassment, dismissal, loss of benefits.

In case the employee or any other person is uncertain whether a suspected wrongdoing is within the scope of the present Policy, they should still be able to raise concern. It is immaterial whether the information is confidential and whether the suspected incident occurred, occurs or would occur in the country of the relevant PPF company or elsewhere and whether the law applying to it, is that of the relevant PPF country's law or of any other country or territory. A legal obligation can include a civil law, regulatory obligation as well as an obligation under criminal law.

This Policy and related other policies are to ensure that corporate and ethical standards are clearly defined and understood by our employees.



The person reporting any suspected wrongdoing, if possible, should make it clear that he/she is making the disclosure within the terms of PPF's Whistleblowing Policy, which shall ensure the recipient of the disclosure to realise this and take the necessary action to investigate the disclosure and protect the whistleblower's identity. All whistleblowing disclosures will be treated as confidential and will be investigated as thoroughly as it is found appropriate and possible.

PPF aims to keep the reporting person informed of the progress of investigation and its likely timescale (if it is not an anonymous report), however it is to be emphasized that at times the need for confidentiality may prevent PPF from disclosing specific details of the investigation or any disciplinary and corrective action taken as a result.

A person raising genuine concern in the context of the present Policy shall also treat any information about the investigation as confidential.

### **3. Protection of the whistleblower**

PPF takes the utmost care to protect the identity of whistleblowers and the confidentiality of their report, within the limits defined by applicable laws and regulations.

Furthermore, PPF is committed to ensuring that an individual is not disadvantaged in any way by raising concerns about suspected reportable behaviour, in particular by discrimination, harassment, dismissal, loss of benefits.

### **4. Roles & Responsibilities**

Executive Committee is responsible and accountable for implementation of the policy, all staff have a responsibility to report concerns.

### **5. Approval, Review Period, Monitoring**

This Policy has been reviewed, discussed and approved by PPF's Executive Committee. The Policy should be reviewed and updated regularly but at least every two years.

PPF conducts quarterly follow-up and in the event of violation of the Policy, PPF shall use all means to eliminate them and take the necessary legal and other disciplinary steps, which are allowed by the respective legal systems.

  
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**Details for revisions and policy updates**

Policy name:	Whistleblowing Policy
Version number:	V2
Effective date of this version:	15 July 2023
Authorized by:	PPF Executive Committee
Scope:	All employees, Contractors and sub-contractors, Agency/temporary staff members, Trainees, interns, as the case may be
Policy Review Cycle:	2 years from effective date
Docket Responsibility of Review Cycle:	Legal Counsel

<b>Revision history:</b>	
Date: 1 April 2019	Creation of V1 of Whistleblowing Policy
Approved by:	PPF Management Board
Date: 15 July 2023	Revision of Whistleblowing Policy, adding protection of whistleblower
Approved by:	PPF Executive Committee



Annex of Whistleblowing policy

## **WHISTLEBLOWING PROCEDURE**

### **1. Introduction**

Whistleblowing is when an employee or any other person reports suspected past, present or imminent wrongdoing, or an attempt to conceal wrongdoing.

This procedure outlines the process that employees or any other person should follow when reporting a perceived wrongdoing within our Whistleblowing policy and the basic principles of how we deal with raised concerns.

It is important that this procedure is followed when raising any concerns, to ensure that the matter is dealt with correctly. Where a concern is raised, the individual will be protected from any unfair or negative treatment. In case of deterring, bullying, isolating or otherwise victimising anyone using these procedures or destroying information about malpractice, these may result in disciplinary action.

### **2. Roles and Responsibilities**

#### **The Chief HR and Legal Officer (as Compliance Function)**

- Monitoring matters raised in liaison with Compliance policy to ensure that there is minimum risk of malpractice and unethical behaviour
- Ensuring that any matters raised are treated seriously and dealt with promptly in accordance with the Whistleblowing policy and procedure
- Where appropriate, ensuring steps are taken to prevent re-occurrence of any concerns
- Acting as a point of contact regarding [compliance@ppfeurope.com](mailto:compliance@ppfeurope.com) and whistleblowing reporting system on [www.ppfeurope.com](http://www.ppfeurope.com) webpage

#### **Business and Functional Heads**

- Promoting and providing a safe culture and environment where employees and other workers are confident that they can speak up about concerns without fear of reproach or recrimination
- Ensuring that mechanisms are in place and if a concern is raised to them, they inform the Chief HR and Legal Officer immediately

#### **Line Managers**

- Providing a safe environment where employees and other workers are comfortable speaking up about matters of concern.
- Ensuring that any matters raised are treated seriously and dealt with promptly in accordance with Compliance policy and the present procedure
- Maintaining confidentiality of the employee(s) involved in the concern

#### **Employees and Other Workers**

- Reporting and pursuing concerns
- Raising concerns to the appropriate person in the appropriate way in line with this policy
- Not raising or pursuing any malicious or vexatious allegations relating to the department or colleagues

#### **Legal Counsel responsible for Compliance**

- Supports the work of the Chief HR and Legal Officer



- Sends confirmation about the reporting to the whistleblower within seven days (if it is not an anonymous report)

### **3. Information needed to raise a concern**

When raising a concern under this procedure, an employee or any other person should provide the following information where possible:

- the nature of the concern and its key elements,
- when it happened,
- who was involved.

In addition to details of the concern, an employee or any other person should try to provide the following information:

- the background and reason behind the concern;
- whether they have already raised a concern with anyone and the response;
- any other relevant dates;
- if applicable, any personal interests must be declared from the outset.

It is important that matters are not investigated by employees themselves. Proof is not needed, just a reasonable, honest belief that wrongdoing has occurred or is likely to occur.

### **4. Raising a concern**

Employees or any other person can raise a concern verbally to the line manager or via either a physical box (within the current idea box system to protect confidential handling), via email address of [compliance@ppfeurope.com](mailto:compliance@ppfeurope.com) or via whistleblowing reporting system on [www.ppfeurope.com](http://www.ppfeurope.com) webpage.

Physical box: at each PPF premises there is a physical box through which employees can raise their concern.

E-mail address: PPF has a dedicated e-mail address of [compliance@ppfeurope.com](mailto:compliance@ppfeurope.com). Only the Chief HR and Legal Officer and legal counsel has access to the e-mail address.

Whistleblowing reporting system: on [www.ppfeurope.com](http://www.ppfeurope.com) webpage, where anonymous report can be done.

Concerns can be raised verbally as well via telephone or personally. The business or functional head, line managers or other appropriate person who has been approached about a concern put the verbal concern in writing and - in addition to ensuring the possibility of checking, correcting and accepting it by signature - hand it over to the whistleblower in a duplicate.

If the whistleblower makes the report in person, the business or functional head, line managers or other appropriate person who has been approached about a concern

- a) - after providing information in accordance with the regulations on the protection of personal data – shall record it in a permanent and retrievable form, or
- b) shall put it in writing and - in addition to ensuring the possibility of checking, correcting and accepting it by signature - give it to the whistleblower in duplicate.

When writing down a verbal concern, a complete and accurate record has to be made. In case of a verbal report, the attention of the whistleblower must be drawn to the consequences of reporting in bad faith, to the procedural rules governing the investigation of the report, and to the fact that his identity will be treated confidentially at all stages of the investigation.



## 5. Procedure for Dealing with Concerns

All investigations will be conducted sensitively, as quickly as possible, and under this procedure. The Legal Counsel responsible for Compliance sends a confirmation about the reporting to the whistleblower within seven days (if it is not an anonymous report). As part of the confirmation, the whistleblower must be provided with general information about the procedural and data process rules.

The investigation should be concluded within 30 days of the matter being raised, though some scenarios may result in a longer timeframe with the approval of the Chief HR and Legal Officer. In this case, the whistleblower must be informed of the expected date of the investigation and the reasons for extending the investigation (if it is not an anonymous report).

Once business or functional head, line managers or other appropriate person has been approached about a concern, they must inform Chief HR and Legal Officer and the Legal Counsel responsible for Compliance immediately of the concern, maintaining confidentiality.

The investigations will be led by the Chief HR and Legal Officer, who is entitled to involve Legal Counsel responsible for Compliance or business and functional head, if necessary. The Chief HR and Legal Officer decides about the actions to be taken with the approval of the Executive Committee.

In connection concerns raised through idea box, the idea box shall be opened every 2 weeks by Plant Director or General Manager and HR responsible (being present together). Concerns are collected and sent to Chief HR and Legal Officer and Legal Counsel responsible for Compliance immediately.

The Chief HR and Legal Officer may invite the whistleblower to supplement and clarify the report, to clarify the facts, and to provide additional information if it is not an anonymous report.

If the initiation of criminal proceedings is justified based on the report, measures must be taken.

The Chief HR and Legal Officer – if it is not an anonymous report - informs the whistleblower in writing about the investigation of the report or its omission and the reason for the omission, the result of the investigation, and the measures taken or planned. Written information is not necessary if the whistleblower was verbally informed.

If the investigation of the report can be omitted or, based on the investigation of the report, the report is unfounded or no further action is necessary, the data related to the report must be deleted within sixty days of the failure to investigate or the completion of the investigation.

If action is taken based on the investigation of the report - including legal proceedings or disciplinary action against the whistleblower - the data relating to the report may be processed within the framework of the internal whistleblowing reporting system until the procedures initiated on the basis of the report are concluded. The Chief HR and Legal Officer shall review the necessity of processing the personal data managed in this way at least annually from the start of data processing.