



## Whistleblowing Policy

### - Europe

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#### Overview

Whistleblowing policies are generally intended to make it easier for members of staff and contractors to be able to report irregularities in good faith, without having to fear that their action may have adverse consequences.

The Whistleblowing Policy of NCH Europe (“NCH”) is a key element for safeguarding NCH’s integrity. It is aimed at enhancing NCH’s transparency and underpinning its system for combating practices that might damage its activities and reputation.

Protecting the integrity and reputation of NCH requires the active support of all members of staff, who are required to report incidents of suspected fraud, forced labour, corruption, collusion and coercion, and other serious infringements of the rules and policies in force at NCH. Members of staff must also cooperate in investigations into such incidents.

By creating an environment of trust and maximum protection for the members of its staff and its contractors, NCH wants to encourage them to cooperate in full. It is putting in place arrangements that will ensure that members of staff and contractors who report irregularities in good faith are afforded the utmost confidentiality and greatest degree of, and most effective, protection possible against any retaliation or reprisals, whether actual or threatened, as a result of their whistleblowing.

#### Scope

The Whistleblowing Policy applies to all NCH Europe staff members and any other person providing NCH with services, including consultants and other service providers under contract to NCH (grouped together for the purposes of this document under the terms “member(s) of staff” or “staff member(s)”).

## Key Principles

The basic key principles of NCH's Whistleblowing Policy are as follows:

- the persons concerned must have a choice between a number of channels for whistleblowing and communication; in certain circumstances, they must be able to bypass the main channels for whistleblowing if these prove inappropriate;
- members of staff must not under any circumstances be subject to reprisals for whistleblowing;
- members of staff who report incidents in good faith must be protected and their identity must insofar as possible remain confidential;
- the reported incidents shall be verified in the appropriate manner and, if they are confirmed, NCH shall take all necessary steps to identify appropriate remedies;
- the basic rights of any person implicated by the reported incidents must be respected, whilst ensuring that the procedures provided for are effective.

## United Kingdom Law – 'Prescribed Persons'

The UK Public Interest Disclosure (Prescribed Persons) Order 2014 (the "2014 Order") sets out a list of over 60 organisations and individuals that a member of staff in one of the UK NCH companies may approach to report suspected or known wrongdoing. The organisations and individuals on the list have usually been designated as prescribed persons because they have an authoritative or oversight relationship with the sector, often as a regulatory body.

The purpose of a prescribed person is to provide staff and contractors of a UK company with a mechanism to make their public interest disclosure to an independent body that may be able to act on them.

An up-to-date list of Prescribed Persons can be found here:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

## Reporting Obligations in all NCH European Entities

Members of staff are required to report any suspected or presumed incidents of illegal behaviour in the activities of NCH or of serious misconduct or serious infringement of NCH's rules, policies or guidelines, or any action that is or could be harmful to the mission or reputation of NCH (hereinafter "irregularities").

Such incidents may involve members of staff, customers, contractors, suppliers, beneficiaries or any other persons or entities that participate or seek to participate in activities undertaken by NCH.

Members of staff are required to cooperate in any official investigation, audit or similar request.

No members of staff or managers of NCH may use their position to prevent other members of staff from exercising their rights or complying with their obligations as indicated above.

## **Reporting Procedures**

There are a number of channels available should someone wish to report issues which include the following (this list is not exhaustive):  
alleged fraud, corruption, money laundering or financing of terrorism or any other unlawful activity that is detrimental to the financial interests of NCH  
serious failure or infringement of ethics or integrity including modern slavery, human trafficking, bullying, harassment and those concerning dignity at work

### Reporting channels

- Report to a member of the senior management team by email or phone
  - Report to the VP HR Europe by email or phone
  - Use one of the hotline numbers listed in appendix 1 – this is a service provided by a third-party supplier
  - Email [compliance@nch.com](mailto:compliance@nch.com)
  - <https://nchcorp.ethicspoint.com> / <https://nchcorpmobile.ethicspoint.com>
- a) In the event of maladministration by NCH in the management of the above procedures, members of staff in the UK may as a last resort refer the matter to a Prescribed Person in accordance with the relevant provisions of the 2014 Order; or, if outside the UK, to the local equivalent to a Prescribed Person in the staff member's country, if any.

## **Reporting Arrangements and Anonymity**

Incidents may be reported by any means at the disposal of the member of staff and are to be described as accurately as possible. They may be reported anonymously in writing, in which case they will be considered by the VP HR Europe, account being taken of the circumstances and nature of the incidents reported.

## **Protection for Whistleblowers**

### ***Principles***

Any staff member who reports an irregularity, provided that this is done in good faith and in compliance with the provisions of this policy, shall be protected against any acts of retaliation. For the purposes of this policy, "retaliation" is defined as any action or threat of action which is unjustly detrimental to the whistleblower because of his / her report, including, but not limited to, harassment, discrimination and acts of vindictiveness, direct or indirect, that are recommended, threatened or taken against the whistleblower.

"Good faith" can be taken to mean the reasonable belief in the veracity of the reported incidents, i.e. the fact that the member of staff reasonably believes the reported information to be true.

Staff members, who make a report in bad faith, particularly if it is based knowingly on false or misleading information, shall not be protected and shall be subject to disciplinary proceedings, or termination of their service / consultancy agreement.

**Protective measures**

The protection of a person reporting an irregularity shall be guaranteed first of all by the fact that their identity will be treated in confidence. This means that their name will not be revealed, unless the whistleblower personally authorises the disclosure of his / her identity or this is a statutory requirement, particularly if it is essential to ensure that the right of the person or persons implicated to be given a fair hearing is upheld. In such a case, NCH shall be required to notify the whistleblower before revealing their identity.

Where members of staff consider that they have been the victim of retaliation for reporting an irregularity or have good reason to believe or fear that they are exposed to a risk of retaliation as a result of their reporting an irregularity, they shall be entitled to complain to the VP HR Europe and request that protective measures be adopted.

The VP HR Europe shall assess the circumstances of the case referred to them and may recommend to the President & CEO that temporary and / or permanent measures that are necessary in the interests of NCH be adopted with a view to protecting the staff member in question. The staff member shall be informed in writing of the results of this procedure.

**Penalties for those taking retaliatory action**

Any form of retaliation undertaken by a staff member against any person for reporting an irregularity in good faith is prohibited. In such a case disciplinary measures shall be taken in accordance with Company policy and procedure, or service / consultancy agreements may be terminated.

Members of staff will be informed of the measures taken by NCH following the discovery of acts of retaliation for reporting an incident. The information provided will not contain any data that will enable the people concerned to be identified.

**Rights of Persons Implicated**

Any NCH staff member implicated by reports of irregularities must be notified in good time of the allegations made against them, provided that this notification does not impede the progress of the procedure for establishing the circumstances of the case. In any event, findings referring to a staff member specifically by name may not be made upon the completion of the above-mentioned procedure, unless that staff member has had the opportunity to put forward their comments in keeping with the principle of respect for the right to be given a fair hearing.

After having heard the implicated staff member, or after having requested the latter to put their case in writing if, for objective reasons, it is not possible to hear them directly, the President & CEO in conjunction with relevant members of the European Leadership Team, shall decide on the measures required in NCH Europe's interest.

**Version Control**

This policy may be varied from time to time to reflect changes in Company policy, procedure or legislative updates. The latest version of this policy will always be available via the NCH intranet or from the HR Team.

This policy does not form part of employees' terms and conditions of employment.

<b>Version No:</b>	<b>Date of change:</b>	<b>Change made by:</b>	<b>Key amendments</b>
V1.0	23/11/2015	Legal Team	Published
V2.0	01/03/2016	Legal Team	Anti-slavery references
V3.0	02/03/2017	HR Team	Reviewed – No Changes Made
V4.0	01/09/2021	HR Team	Included hotline numbers from Compliance Line, included email address
V5.0	01/06/2024	Compliance	Contact details update

## **Appendix 1**

NCH Corporation (and its affiliates) uses a third party Hotline provider, Compliance Line to provide 24 hour/7 day a week, multi-language support in administering our Hotline program. Associates are to use the below listed numbers when reporting allegations of bribery and anti-corruption, fraud and misconduct, discrimination, harassment and workplace safety issues.

Reporting will be treated in a confidential manner to the maximum extent possible. We encourage you to identify yourself, as it allows the investigation to be more thorough. If you are not comfortable identifying yourself, then you may report anonymously. In some countries in Europe, abuse of the hotline may expose the caller to disciplinary sanctions, however, the good faith use of the hotline, even if the facts are later found to be incorrect or inconclusive, will not expose the caller to disciplinary action. The Hotline numbers for each country are found below.

### **Europe**

Czech Republic: 800880806

Germany: 800 181 9843

Hungary: 06 80 020 305

Italy: 800 81 9541

Poland: 800 005 356

Romania: 0800 890 559

Slovakia Republic: 0800 232760

Spain: 900 751436

Sweden: 020-79-66-49

Turkey: 0080049240880107

UK & N Ireland: 0800 066 8929