

Whistleblowing Guidelines



CHEMYUNION

Inspiring Innovation



1. Introduction

- Chemyunion strives to offer and maintain an open and highly ethical business atmosphere. Our employees, customers, suppliers and other stakeholders are the most important source of information in the reporting of potential cases of misconduct that need correction.
- In our Whistleblowing Channel, you can report suspected attitudes that violate this values and guidelines, with strict confidentiality. This channel is used as an alert system to reduce risks and as an important tool to promote ethics and to preserve the trust in our business. Whistleblowing can be made openly or in anonymity.



I. Introduction

- This whistleblowing guidelines are intended to encourage Chemyunion's target audiences to report cases of misconduct involving our company, without any risk of victimization, discrimination or subsequent disadvantage, and to ensure a proper investigation process.



2. When to blow the whistle

- Our Whistleblowing Channel can help us identify serious risks affecting employees, investors, suppliers, customers, partners, the society as a whole or the environment.
- Whistleblowers do not need to provide concrete evidence of misconduct to report their concerns. However, reports must be made in good faith and honestly. Channel misuse, i.e. to deliberately report false or misleading information, is a serious offense.



3. How to blow the whistle

- Any Chemyunion stakeholder who becomes aware of an issue or behavior that violates the values of our company or our Code of Conduct can anonymously report their concerns through the Whistleblowing Channel.
- Anonymous report: managed by WhistleB, an unbiased service provider that protects the confidentiality of whistleblowing information. Neither Chemyunion nor WhistleB can identify or track the source of a report, unless the whistleblower provides his/her contact information. WhistleB does not save whistleblowing metadata and cannot track your IP address. This ethical communication service enables a dialogue between Chemyunion case management team and whistleblowers in an anonymous and safe manner.



4. The investigation process

Case management team

- Only the case management team has access to the reports through our Whistleblowing Channel. The team can include other people and request other confidential information during the investigation process.



4. The investigation process

Incoming reports

- All reports are handled with genuine commitment. The case management team assesses the content of incoming reports and checks whether it is considered case of misconduct according to Chemyunion principles. If the report is considered whistleblowing, appropriate investigation actions are taken, as described below. It is important to stress that critics and complaints should be reported through a specific communication channel on our website – contact section.



4. The investigation process

The case management team can refuse to accept a report if:

- § The alleged behavior is not a reportable behavior based on our whistleblowing guidelines;
- § The report was not made in good faith or is malicious;
- § There is insufficient information to enable a more detailed investigation;
- § The issue reported has already been solved.



4. The investigation process

If a report includes issues not covered by the scope of the whistleblowing guidelines, the case management team must take appropriate actions to solve the problem.

Personal information or information related to health status, political, sexual or religious convictions will not be taken into consideration in the investigation.



4. The investigation process

Investigation

All reports accepted associated with an alleged case of misconduct will be subjected to an investigation according to the whistleblowing guidelines. The case management team will determine how the investigation will be conducted.

§ All whistleblowing reports are handled with confidentiality.

§ A report will not be investigated by someone who may be involved with the whistleblowing.

§ When necessary, the case management team will ask clarification questions through our Whistleblowing Channel.

§ No one in the case management team, or any person participating in the investigation, will be able to identify whistleblowers by any means.



4. The investigation process

Whistleblower protection in case of non-anonymous reporting

- Whistleblowers will not suffer any sanctions or personal disadvantage in the relationship established if they express their concerns. Whistleblowers may be mistaken provided that they have acted in good faith.
- Unless not appropriate, whistleblowers who have chosen to provide their personal information will be kept informed of investigation results, subject to the confidentiality of those against whom the allegations have been made and to any other confidentiality matters.
- In case of potential criminal offenses, whistleblowers will be informed that their identity may be disclosed during a lawsuit.



4. The investigation process

Protection and information to a person specified in a whistleblowing report

- The rights of individuals affected by allegations made through this ethical channel are subjected to relevant data protection laws. The persons affected will have the right to access information concerning to them and to require any changes in case of incorrect, incomplete or inaccurate information.
- These rights are subjected to any safeguarding measures needed to avoid the destruction of evidence or other obstacles imposed to whistleblowing handling and investigation.



4. The investigation process

Data storage and deletion

- Data storage and deletion will occur in accordance with the guidelines of each Chemyunion business unit, currently: Brazil, the United States, and Colombia.



We count on you to do
the right thing!



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