

A small white icon of a microphone with a speech bubble, positioned above the main title text.

# Speak Up Policy and Procedure



# 1. Introduction

*Inalfa's Code of Conduct contains corporate values, principles and guidelines for the way Inalfa aims to conduct itself in relation to its customers, employees, suppliers, business partners and the communities in which it operates.*

*Inalfa is committed to high standards of openness and integrity in its work. To maintain these standards, Inalfa encourages all employed by Inalfa, regardless of the type of contract (e.g. temporary, fixed, at will), working for Inalfa or engaged through a third party, having concerns about any violations of Inalfa's Code of Conduct to come forward and to express their concerns without fear of punishment or unfair treatment.*

*This Speak Up Policy and procedure is developed to give guidance on how to deal with violations of Inalfa's Code of Conduct.*

*Jörg Buchheim*

*Chief Executive Officer & President*

## 2. Principles

### 2.1 Aim of this policy

The aim of this policy is:

- To provide the possibility for employees to raise concerns and to define how to handle these concerns in case it is not possible to resolve the concerns in any other way;
- To enable management to be informed at an early stage about possible violations;
- To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith;
- To support the Company values of Transparency, Respect, Focus and One Inalfa, and to promote Inalfa's culture of honesty and integrity.

### 2.2 Scope of the Procedure

The scope of the procedure is to report any concerns of behaviors conflicting with the principles set out in the Inalfa's Code of Conduct, such as:

- Discrimination of any kind
- Harassments (sexual and other types)
- Business and financial records and reports accuracy
- Prevention of fraud
- Bribery and improper payments
- Prevention of money laundering

## 3. Reporter

Everyone employed by Inalfa irrespective of the duration of the employment and any party working for or on behalf of Inalfa may report a (reasonable suspicion of) a violation of the Code of Conduct. Also in case of (reasonable suspicion of) a violation of social interests by a violation of laws or legal requirements, a danger for public health, persons, environment or the proper functioning of public services or a company.

## 4. Reporting options

### 4.1 General

As the reporting should be confidential in nature, do NOT distribute or report your concerns or opinions in a massive distributing format, this would only jeopardize any further investigation and hinder a correct conclusion. Reporting by a massive distribution is not appropriate and may result in disciplinary actions up to and including termination of employment contract or legal actions for those not employed by an Inalfa organization.

### 4.2 Supervisor / Manager

It may not always be clear whether a particular action falls under the principles of the Code of Conduct, in such cases, Inalfa would prefer that you report your concerns in good faith, rather than keep them to yourself. You are encouraged to discuss the matter first with your supervisor / manager. This is the fastest way to clear up any misunderstanding and also the best way to ensure a good and open working environment throughout the organization.

### 4.3 Local HR Representative

Alternatively, you can seek help from a local HR representative to define if your concerns are compliance related, and ultimately to provide you better directions to raise your concerns. The Local Compliance Delegate and Regional Compliance Officer will be involved if the reported activity or omission violates the Inalfa Code of Conduct.

### 4.4 Regional Compliance Officer(s) and Group Compliance Office

If notifying your supervisor / manager or local HR representative is not reasonably possible or appropriate for whatever reason, or if you believe the response you received is not in the best interest of Inalfa or its stakeholders including

yourself, you can choose to contact the Regional Compliance Officer or Group Compliance Office in person. In the Group Compliance Office and regions there are one or more dedicated person(s) appointed (Regional Compliance Officer(s)), whom you can ask for advise in confidence or discuss with in person any concerns on a 'no name' basis or to whom you can report a (reasonable suspicion of) a violation of the Code of Conduct. If you believe that it is not desirable to contact or to report your concerns in person through above avenues, please e-mail to the Group Compliance Office: [noncompliance@inalfa.com](mailto:noncompliance@inalfa.com). This e-mail address can also be used when you want to report anonymously.

## 5. Before and after reporting

You will not be expected to prove truth of the reported concerns, but you should provide as much detailed information as you can to enable the assessment and investigation of your concerns. You may find it helpful to use the Speak Up reporting template including:

- The nature of the reported concerns (e.g. financial malpractice, theft, bullying);
- Names, dates, places, witnesses and other relevant information;
- Any documents that may support your report

A confirmation will be sent to you through e-mail within five working days after a report is received by the Regional Compliance Officer or Group Compliance Office in person or via e-mail. You are advised to contact the Regional Compliance Officer or the Group Compliance Office to follow up four weeks after you have received the confirmation.

If the case is to be investigated, the Regional Compliance Officer or the Group Compliance Office will inform you about the final results on the reported concerns within twelve weeks. Otherwise, you will be communicated with a new deadline of final results.

If the case is to be dismissed, you will be notified within six weeks after filing.

In case you believe that your concerns have not been handled appropriately or that an investigation has not been performed correctly, please contact the Integrity Committee at [integrity.committee@inalfa.com](mailto:integrity.committee@inalfa.com) or via:

Inalfa Roof Systems Group B.V.  
Attn: Integrity Committee  
P.O. Box 505,  
5800 AM Venray, The Netherlands.

## 6. Integrity Committee Handling of the reported cases

Depending on the nature, urgency and potential impact of your concerns, a two-phase approach will be used by the Integrity Committee to handle the concerns:

1. Initial review and inquiries - the Group Compliance Office will assess each reported case to see if it qualifies as a violation of the Inalfa Code of Conduct and other policies. You may be approached for additional information.
2. Further review and investigation - the Integrity Committee will review the assessment from the Group Compliance Office. Cases that qualify will be further handled by the Integrity Committee. Otherwise, cases will be dismissed.

For further information, please contact the Regional Compliance Officer or Group Compliance Office.

## 7. Safeguarding your position

### 7.1 Confidentiality and Anonymity

All reports will be dealt with in a confidential manner. In case you report in person, the recipient might know your identity. If you wish to be anonymous, you should report in first instance through [noncompliance@inalfa.com](mailto:noncompliance@inalfa.com).

The Regional Compliance Officer and the Group Compliance Office are not allowed to disclose your identity without your permission, except in the following cases:

- If required by law or by governmental authorities
- If the report - in reasonable view of the Group Compliance Office - has been submitted maliciously
- In the event of an important public interest  
If your identity is revealed, information will only be disclosed to those persons on a need-to-know basis.

### 7.2 Prevention of Punishment or Unfair Treatment

Inalfa will not tolerate punishment or unfair treatment when concerns are raised in good faith. Anyone who reports a violation of the Inalfa Code of Conduct in good faith will be given protection and shall in no way be put at a disadvantage as a result of his or her report. If the reporter is punished or treated unfairly by anyone, this will result in consequences for that person.

## 8. Safeguarding the person(s) reported upon

### 8.1 Informing Person(s)

The person(s) subject of the reported case will be informed by the Regional Compliance Officer or the Group Compliance Office about the reported

matter as soon as possible after the case has been reported to the Integrity Committee, unless such would seriously hinder the investigation.

### 8.2 Privacy

Inalfa is committed to protect the privacy of the persons involved to the fullest extent possible and in accordance with applicable laws. Any personal data obtained, as part of the Speak-Up procedure, will only be used for the purposes explained in this Speak-Up procedure and will only be provided to those persons on a need-to-know basis.

## 9. Abuse of the speak up procedure

Inalfa encourages employees to express concerns in good faith. If upon investigation, your concerns cannot be confirmed or may not have substance, no action will be taken against you. However, the Speak-Up procedure should not be used for:

- Personal disputes;
- Grievances related to collective bargaining agreements;
- Fraudulent allegations and imprudent imputations.

There are procedures for handling personal disputes and grievances. Please contact your HR representative or union representative to report a personal dispute or a grievance related to your local union collective bargaining agreement where applicable. Making a false report can result in unfavorable consequences for you (e.g. termination of the employment), and you may be held legally liable for damage and/or harassment suffered by anyone who has been affected by such false reports.

## 10. Report externally

We strongly encourage you to raise concerns internally through one of the available channels, nonetheless we do not intend to withhold you from reporting to authorities when required by law. Taking a concern to an outside party (e.g. the media) can have serious implications for Inalfa, for the persons involved and possibly also for yourself (e.g. unpermitted disclosure of Inalfa's confidential information). By speaking up internally, you give Inalfa the chance to look into the matter and take actions (if needed). In this way we can truly improve Inalfa together.

## 11. Implementation

The management team of the regions and group staff departments are to communicate the policy and procedure effectively to all employees and to organize necessary conditions where there are no obstacles for any employee to report a (reasonable suspicion of) a violation of the Code of Conduct.

The management teams will at least take the following actions:

- On a regular basis, inform all employees and any party working for or on behalf of Inalfa about the existence of this policy and procedure in the local language, including contents of the procedure, contact names, phone numbers and web/e-mail addresses
- Provide the Local Compliance Delegates and Regional Compliance Officer(s) and management with sufficient support to enable the correct execution of this procedure.

The Integrity Committee is responsible for:

- Proper administrative procedures for reporting violations;
- Decision making on accepting, rerouting or dismissing a report;
- Approval of initiating an internal/external investigation and issuing an investigation report;
- Yearly review of all incoming e-mails to Integrity Committee.

To keep the procedures alive in the organization, communications to all employees will be repeated regularly and contact information of the Local Compliance Delegates, Regional Compliance Officer(s), the Group Compliance Officer and the Group Compliance Office will be updated at all time.

The Integrity Committee is a commission of the Board of Management of Inalfa Roof Systems Group, with the following members:

- President & CEO of Inalfa Roof Systems Group;
- Another member of the Board of Management (currently CIO) of Inalfa Roof Systems Group;
- Group General Counsel (\*);
- Group VP Human Resources (\*).

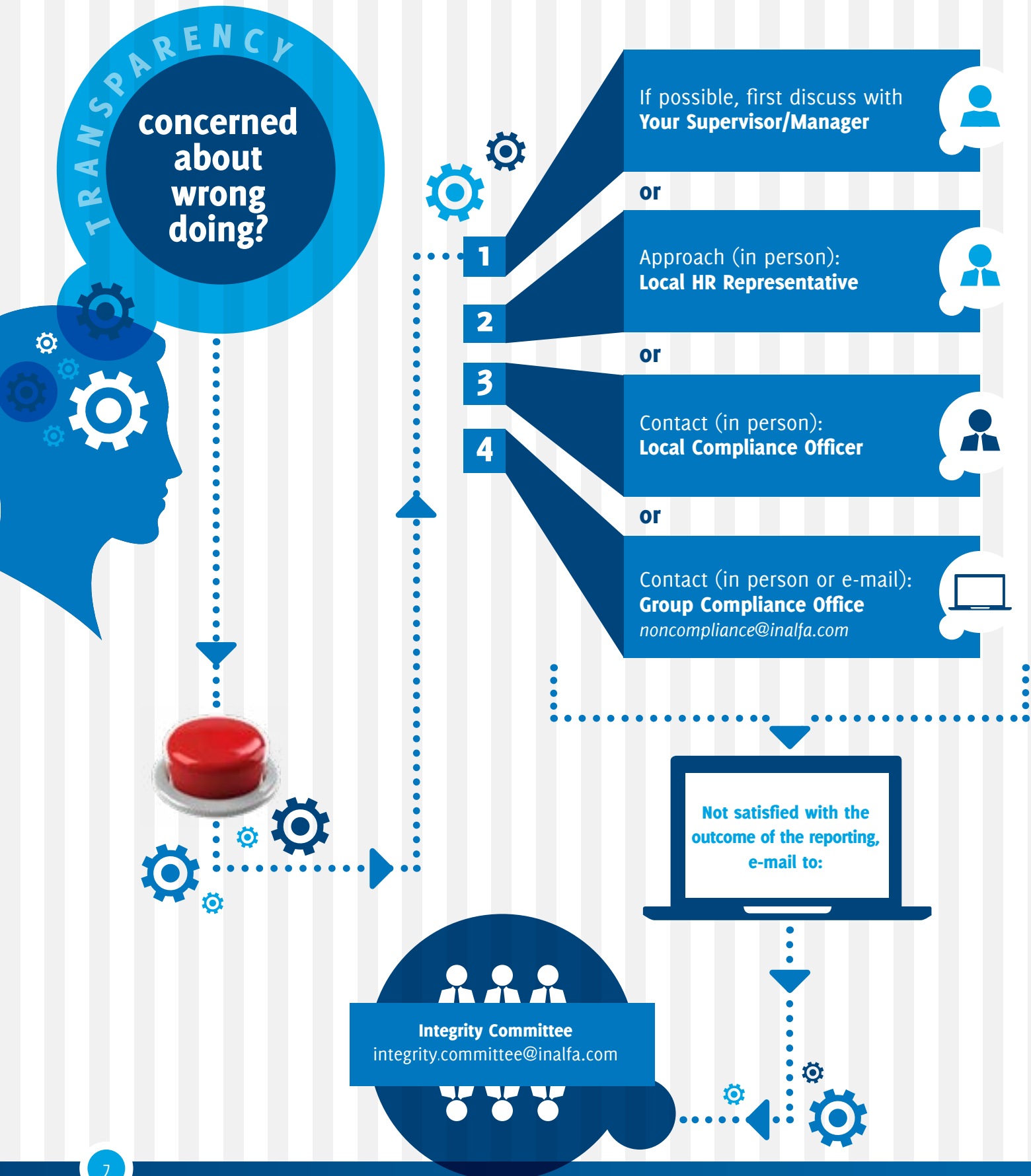
## 12. Evaluation

The Speak-Up Policy, procedure and its implementation will be part of the annual cycle of monitoring compliance related to the Inalfa Code of Conduct. Annually, the Integrity Committee will present a report of their activities to the Board of Management of Inalfa Roof Systems Group.

*Group Compliance Office, September 2020*

(\* member with advisory role)

# How to speak up?





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