

# RUBIX

## GROUP WHISTLEBLOWING POLICY



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## Summary of this Policy:

We are committed to the highest standards of openness, integrity and accountability.

An important aspect of accountability and transparency is a mechanism to enable employees to voice compliance related concerns in a responsible and effective manner helping us to prevent and detect serious malpractice or wrongdoing, particularly related to corruption.

If you discover any information which you believe shows serious malpractice or wrongdoing within the Rubix Group (as defined in art. 1) in particular related to corruption, then this information can be disclosed internally in good faith without fear of reprisal in accordance with the rules described by this Policy.

This Policy gives examples of serious concerns as defined in article 1 that could affect the Rubix Group (fraud, corruption, violation of laws, crime and others) and can be reported via a whistleblowing system and describes the process and conditions of raising a “Reported Matter” or “Alert”.

### Reminder:

*A Reported Matter can be addressed by several means:*

1. *Consult the Code of Business Conduct and Ethics of the Rubix Group and the relevant internal Policies on the matters you are concerned with;*
2. *Talk to your supervisor / Line Manager: they remain your primary contact to answer a question or solve an issue you may have;*
3. *Consult with your in-country or group HR departments to raise the matter;*
4. *If you cannot or wish not to use one of the above 3 options, please raise a Reported Matter via the Safecall Whistleblowing system.*

Our service provider, Safecall will receive and document non-compliance reports received via a confidential call centre, on the specific Rubix website. Safecall is an independent and experienced, third party reporting service operator based in the UK. Safecall will document your Alert and relay the information to us for investigation and follow-up.

If the information provided is sufficiently supported by the facts and details, an investigation will be conducted in accordance with this Policy. If you provide your contact information, the person in charge of investigation of your Alert will keep you informed and may reach out to you for additional information related to your report.

All information and personal data received through any of reporting resources will be treated confidentially.

We offer protection to the employees raising an Alert in accordance with the rules defined in this Policy.



## 1. Purpose and scope of the Policy

This Rubix Group Whistleblowing Policy (hereinafter “**Policy**”) is designed to enable Employees to report effectively any **serious** concerns affecting Rubix relating to any or more of the following matters:

- Financial and or tax malpractice, impropriety, fraud or corruption;
- Failure to comply with a legal obligation;
- Dangers to health & safety or the environment;
- Crimes or offenses;
- Attempts to conceal any of the above;

As well as

- any other serious and clear violation of laws and/or regulations including international treaties or unilateral acts of international organisations taken in accordance with international treaties;
- a serious threat or harm to the general interests;
- contravention of the Group’s Code of Business Conduct and Ethics or Group’s internal procedures;

Hereinafter “**Reported Matter**” or “**Alert**”.

This Policy applies to the Rubix Group, all of its subsidiaries and affiliates (collectively “**Rubix**” or the “**Company**”), in all countries where Rubix operates and to all employees (internal, external, temporary), officers and directors acting on behalf of Rubix, (individually “**Employee**” or collectively “**Employees**”). An Employee raising an Alert is hereinafter referred to as the “**Whistleblower**”.

Under no circumstances should this whistleblowing system be used for mere impressions or suspicions, without being supported by facts and an appropriate basis.

The application of this policy shall be subject to any legal restrictions or rights arising from each jurisdiction in which the Company operates. In the case of conflicts or inconsistencies between the policy and local country laws or regulations, the local country laws shall apply.

In order to address certain countries local legal requirements, country specific addendums may be incorporated by reference into this policy prior to implementation of the policy in such countries.



## 2. General rules

- 2.1 Good faith - Employees can raise a Reported Matter that they are personally aware of and they have an honest and reasonable belief that has occurred, is occurring, or is likely to occur.
- 2.2 Protection - Employees who are personally aware of and disclose a Reported Matter (Whistleblowers) shall be protected provided:
- the disclosure is made in good faith,
  - the Employee reasonably believes that the reported information and allegation is serious and substantially true,
  - the disclosure is not made based on personal gain or bias.
- 2.3 Anonymous allegation - This Policy encourages Employees to provide their name to any disclosures in order to facilitate follow up enquiries, however anonymous allegations are possible, if not forbidden by local law.
- 2.4 Untrue allegations - If an Employee makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that Employee. In making a disclosure, the Employee should exercise due care to ensure the accuracy of the information. If, however it is found that an Employee has made **deliberately** false allegations, disciplinary action may be taken against that Employee by their employer and she/he risks prosecution as defined by law.

## 3. Raising of an Alert

- 3.1 As a first option, Employees can raise a Reported Matter to their direct or indirect supervisor, their local entity's management (Human Resources or the Financial Director) or to a compliance officer or compliance committee as well as to Group Human Resources.
- 3.2 If the Employee does not wish to report the matter as described above in article 3.1, Rubix has established an independent confidential reporting system allowing Employees to comfortably raise a Reported Matter in an alternative way in partnership with Safecall which provides a professional, independent and confidential means of reporting concerns. A detailed Call report process is attached in Appendix 1.



## 4. Investigation of Alerts

- 4.1 Alerts provided with sufficiently detailed information or documentation and therefore considered adequately serious shall be investigated by the Company. In the case of an anonymous Alert, the Company will check the credibility of the concern and the likelihood of confirming the allegation from attributable sources as the first step of investigation.
- 4.2 In the case of a non-anonymous alert, the Whistleblowers will receive an acknowledgement of receipt. He / she will then be informed if no investigation is deemed necessary and the reasons as to why.
- 4.3 If an internal investigation is launched, the Alert will be investigated by the appropriate investigating officer(s) ("Officer") chosen by the Company.
- 4.4 The alleged person(s) concerned by the Alert shall be informed as soon as possible after having taken all appropriate preventive measures (i.e. required prevention of evidence destruction or protection of the information or data).
- 4.5 If the investigating Officer deems it appropriate for an Alert to be investigated locally in an affiliate without any conflict of interest, she/he can delegate the report to a competent local point of contact who would be entitled to operate independently from the affiliate's CEO/manager. Indeed, an Alert can be addressed locally to the Financial Director or Human Resources Director, always under the supervision of the Group's investigating Officer. This should be done independently and confidentially, without any interference from other functions within the affiliate.
- 4.6 A face-to-face interview with the Whistleblower is mandatory in all cases and must be organised to ensure the facts that have been reported are perfectly understood by the investigating officer (except anonymous Alerts).
- 4.7 Particularly complex, urgent and sensitive Alerts may justify the delegation to an external skilled and independent third party for confidential treating the Alert and this will be communicated to the Whistleblower as soon as possible.
- 4.8 Once the investigation is performed, the Group Compliance Team may be involved, in order to determine whether recommendations or corrective actions are necessary. Corrective actions may consist of disciplinary measures or judicial procedures depending on local/national laws and regulations.
- The Group Compliance Team is a team created at Rubix Group level composed of the Group's independent Internal Auditor, Group Legal Compliance Manager and Group HR Manager.*
- 4.9 The Investigating Officer(s) shall ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations. Due to the varied nature of Alerts, which may involve internal / external investigators, it is not possible to lay down precise timescales for such investigations.
- 4.10 At the end of the investigation, and whatever the result, an explanatory written decision is sent to the Whistleblower by the investigating Officer (for non-anonymous Alerts).



## 5. Confidentiality and Data Protection

- 5.1 All Alerts, related information and the personal data of the Whistleblower and persons concerned by the Alert shall be treated in a confidential and sensitive manner as long as it does not hinder or frustrate any investigation made by a public authority.
- 5.2 The elements permitting the identification of the Whistleblower can be only disclosed with his/her approval, except to the judicial authority.
- 5.3 Personal data of a person concerned by the alert cannot be disclosed until the reported facts are founded, except to judicial authority.
- 5.4 No information shall be transmitted out of the dedicated service in charge of dealing with Alerts, except to verify the facts that have been reported.
- 5.5 When an internal investigation, disciplinary or judicial procedures are ongoing, data is kept until the end of these procedures and as long as legally required. In the case it is required by the applicable law, when the internal investigation ends without any additional proceedings, the elements of the file identifying the Whistleblower and persons concerned by the Alert shall be destroyed after a maximum time period of two months, starting from the moment the file is closed.
- 5.6 At any time, Whistleblowers can request to contact the Investigating Officer to get any information regarding personal data that have been recorded. The Whistleblower can request access to their personal data, rectification of incorrect data as well as request its erasure provided that their personal data treatment is no longer necessary in the context of the investigation or in case he/she withdrawn its consent and there is no other lawful basis for processing.

## 6. Whistleblower protection

- 6.1 Rubix is committed to protect the Whistleblower raising an Alert in accordance with the rules defined in this Policy and commits to not use any form of retaliation, direct or indirect, such as a change of status, harassment or any other form of discrimination, as a consequence of using this Policy or submitting Alerts through other means.
- 6.2 Additionally, the Whistleblower can be subject to legal protection as defined by locally applicable law.
- 6.3 Any abusive Alert or one proven to have been made in bad faith (i.e. deliberately false or misleading allegations) exposes the Employee to disciplinary sanctions and/or judicial pursuits depending on national laws and regulations.
- 6.4 If the Whistleblower realises after raising the alert that he/she was wrong and that the allegations turn out to be mistaken, he/she is expected to inform the Group's Investigating officer as soon as possible. No negative consequences shall arise if the initial concerns were reported in good faith, i.e. made without malice or in a disinterested manner.



## 7. Company rights

Rubix reserves the right to amend or rescind, in whole or part, this Policy at any time and without notice.

Should you require any assistance with the contents of this Whistleblowing procedure, you may contact us at:

Email: [compliance@rubix-group.com](mailto:compliance@rubix-group.com)

*Please do not use this contact to raise an alert*

Approved:

Name	Function
David Morkeberg	Group HR Director





## APPENDIX 1: Call report process

Safecall confidential **Call Centre** is open 24 hours per day, seven days a week and 365 days a year on below **free numbers** allowing the employees to speak to someone in their language.

Alerts can also be raised via the **website**: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

International number	00 44 191 516 7749
Country	Phone Numbers
Austria	00 800 7233 2255 (free)
Belgium	00 800 7233 2255 (free)
Czechia	00 800 7233 2255 (free)
Denmark	00 800 7233 2255 (free)
Finland	990 800 72332255 (free)
France	00 800 7233 2255 (free)
Germany	00 800 7233 2255 (free)
Hungary	00 800 7233 2255 (free)
Iceland	00 800 7233 2255 (free)
Italy	00 800 7233 2255 (free)
Luxembourg	00 800 7233 2255 (free)
Netherlands	00 800 7233 2255 (free)
Norway	00 800 7233 2255 (free)
Poland	00 800 7233 2255 (free)
Republic of Ireland	1800 812740 (free)
Reunion Island	+44 191 516 7751
Romania	0372 741 942
Slovakia	0800 004 996 (free)
Spain	00 800 7233 2255 (free)
Sweden	0850 252 122 (free)
Switzerland	00 800 7233 2255 (free)
UK	0800 9151571 (free)

Safecall's role is to primarily take a report and submit it to the Company chosen contact persons (investigating officers) within 24 hours of the conclusion of a call. The report will detail the time, date and nature of the call together with full factual information, corroborated where possible. The Alert should display accurate and precise description of the allegations to make sure their object is related to real facts.



When a person calls any of the Safecall numbers from outside the UK they will be offered a selection of language options appropriate to their location. The caller then hears a short-recorded introduction in their language and is then connected to a Safecall operator and an interpreter. The call process then follows the structure below:

- The person contacting Safecall will be asked to identify who they work for. This helps set the scene that the number they are calling is not part of their organisations internal system operating under a different name.
- Calls are handled by skilled operator and will be treated in complete confidence.
- The operator will explain to the caller who is Safecall, its role and the procedures to be undertaken.
  - Safecall will pass all information to the Company;
  - Safecall takes hand written notes of the concern;
  - The conversation is not audio recorded;
  - Safecall produces a written report;
  - Who the report will go to within the Company;
  - When the report will be sent.

The caller is asked to provide two passwords and they are provided with a unique Personal Identification Number (PIN). The pieces of information provided by the caller and the PIN number are used during any future communication between Safecall and the caller to ensure the security of the caller and the organisation.

- The caller is then asked for;
  - Their name
  - Contact details
  - Their position within the organisation
  - Where exactly they work (which factory, department etc.)
  - How they became aware of Safecall (poster, intranet etc.)
- If the caller wishes to report a matter anonymously, Safecall will comply with their request so far as legally possible. The operator will explain to the anonymous caller the need for asking further questions to gain any corroboration available to support the information they are giving to Safecall. Safecall will guarantee the anonymity and send to the Company a non-gender specific report or written in the third person to maintain that status.
- All callers are encouraged to keep in touch with Safecall and arrangements are made for future contact within an appropriate timeframe. The time of future contact may vary due to the nature or seriousness of the call and enables us to provide any appropriate feedback or ask further questions of the caller. This is extremely important with anonymous callers and enables Safecall to build up trust as well as making them available for the Company requested questions or further developments.



Callers can log onto Safecall's website and by using the first password they gave to Safecall and the PIN Safecall supplied them with, they will be able to log into a secure portal where they will be able to access any up-dates the Company has sent to Safecall in connection with the Alert. They will also be able to leave any comments, feedback or answers to any questions that the company has asked. If they do leave any further information on the site Safecall will get a notification and will send the information onto the companies chosen contacts.

- Once the caller has finished reporting their concern, Safecall's operator using its hand-written note, writes up a report. This report is then passed to an operations manager who will check the report and will then pass the report to be sent to the contact persons (investigating officers) within the Company.