



# *Code of Conduct*



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# A message from the CEO

*Dear colleagues and stakeholders,*

**Our Code of Conduct expresses the general principles of behaviour that everyone working at or with Sibelco should respect. It provides the cornerstone principles for ethical and sustainable businesses and outlines how to act, not only in compliance with the laws, but also with integrity and ownership. This Code of Conduct inspires and encourages all of us to do the right thing.**

The Code of Conduct is based on those things that unite everyone at Sibelco:

**Our purpose** – Material Solutions Advancing Life – captures both who we are and what we aim to be for our employees, our customers and our stakeholders.

**Our values** – Integrity, Respect, Ownership, Excellence and Teamwork, guide our actions and decisions and define how we want to behave and build relationships with each other.

We have exciting and challenging times ahead to fulfill the ambition of our Vision: “We will become the global leader in the mining, processing and selling of silica sand, and a regional leader in clays, feldspathic minerals, olivine and glass recycling. Sustainability, including a relentless focus on safety & CO<sub>2</sub> emissions reduction, is a fundamental part of our vision”.

Please read the Code of Conduct carefully and make it part of the way you work. We all have a role to play in turning the words of this Code of Conduct into action and ensuring that it becomes the catalyst for a positive and sustainable future for Sibelco.

**Hilmar Rode,**  
CEO



THIS CODE OF  
CONDUCT INSPIRES  
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ALL OF US TO DO THE  
RIGHT THING





# About the Code of Conduct

*Holding ourselves to the highest standard of ethics is crucial to our reputation as a company. We have a shared responsibility to live by our values in our day-to-day activities, regardless of where we are or what we do.*

This Code of Conduct is the guide to putting the company values into action. We encourage every Sibelco employee to practise ethical business behaviour and act lawfully and with integrity, while promoting responsible decision making.



**Ownership**



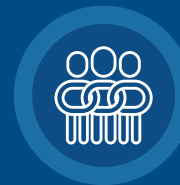
**Respect**



**Excellence**



**Integrity**



**Teamwork**

“ LIVING IN ACCORDANCE WITH THE CODE OF CONDUCT IS A TEAM EFFORT ”

A series of specific policies provide more detail on some of the topics, which is why we refer to them throughout the Code of Conduct. Please take the time to read them together with this Code of Conduct.

Acting in accordance with the Code of Conduct is a team effort. It applies to all employees, regardless of location, seniority level or function. We expect our leaders to be role models for the Sibelco values. We also expect our suppliers and other business partners to share our commitment to ethical business practices and act with integrity in accordance with our Supplier Code of Conduct.

# Integrity & ethics in the workplace

## HEALTH AND SAFETY

Health and safety of our people, contractors and visitors is a number one priority. No job is so important that it cannot be done safely.

Working together as one global team, we are embedding a health & safety culture in which:

- *Everyone is a safety leader*
- *We ensure safe production*
- *Unsafe conditions are identified and action taken*
- *We share good practices and learn from our incidents*

Every effort is made to ensure that every person is safe in the workplace. We achieve this by:

- *Training, understanding and respecting our lifesaving rules*
- *Implementing global health and safety standards*
- *Encouraging safe behaviours to ensure safe production*

As part of our commitment to health and safety, all workplaces should be free from the use of alcohol, drugs and misuse of other substances and people are fit for work. Anyone who visits a Sibelco site must comply with our [Safety & Health Policy](#).

## WHAT IF?

### Question:

*Our work safety standards far exceed what is required by law where I work and our competitors only follow these local requirements. Shouldn't we do the same?*

### Answer:

No. We must adhere to our company safety and health policies. Sibelco is committed to providing people with a safe and healthy environment everywhere we operate, even if this means we exceed local requirements.



# Integrity & ethics in the workplace

## SUPPORTING OUR PEOPLE

We work as one team, interacting in a way that promotes trust and respect. Each of us contributes to our values of excellence and integrity in the workplace.

We recognise the importance of our employees and aim to attract, engage and retain the best talented people. We challenge and support in equal measure, and are committed to guide, coach and support each employee to grow. We hire, reward and promote based on performance, qualifications, skills and behaviour in line with our values.

We also strive to promote a work environment of confidence and trust. We want all our people to be treated respectfully and feel safe.

WE SUPPORT



### **The Principles of the UN Global Compact**

#### **Principle 3:**

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

#### **Principle 4:**

the elimination of all forms of forced and compulsory labour;

#### **Principle 5:**

the effective abolition of child labour;

#### **Principle 6:**

the elimination of discrimination in respect of employment and occupation.



# Integrity & ethics in the workplace

## DIVERSITY, INCLUSION & BELONGING

***We believe that a culture based on diversity, inclusion and belonging is critical to our business.***

We recognise the strength of our global workforce and value diverse talents, cultures, backgrounds and insights. We foster an inclusive culture that empowers our colleagues to bring their authentic selves to work. We strive for an inclusive environment and a culture that gives each employee a strong sense of belonging. At Sibelco, everyone should feel heard, respected and treated fairly. We expect our business partners to share our commitment to diversity, inclusion and belonging.

# Integrity & ethics in the workplace

## HUMAN RIGHTS

### WE SPEAK UP AGAINST ANY FORM OF HARASSMENT, DISCRIMINATION OR INTIMIDATION

Sibelco does not tolerate any form of harassment, discrimination, bullying or disrespectful behaviour based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age, political opinion, or any other inappropriate basis.

Harassment and bullying can take many forms. If you experienced unwelcome gestures, offensive jokes, suggestive or derogatory comments, verbal, or physical threats, humiliating or intimidating actions, social or psychological abuse, please report those directly to Human Resources representatives or the Legal Team.

Also, the [Reportline](#) is available to use when permitted by local law.

### WE PROHIBIT ANY FORM OF MODERN SLAVERY AND FORCED LABOUR OR CHILD LABOUR

Sibelco prohibits all forms of forced labour in all its operations. We condemn any kind of slavery and do not tolerate inhumane treatment of employees or contractors, including through any form of physical punishment or abuse.

Sibelco prohibits child labour in its operations and does not permit child labour by its business partners. We respect the internationally recognised minimum working age in all our operations and expect our suppliers to apply our zero tolerance for any forms of forced or compulsory labour. We have a zero-tolerance for modern slavery.

### WE COMPLY WITH MINIMUM WAGE AND WORKING HOURS LAWS

Sibelco is committed to complying with minimum wage standards and laws and we adhere to the relevant working hours laws.

### WE RESPECT FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We uphold the freedom of association and the recognition of the right to collective bargaining to ensure that employees can associate to negotiate work relations effectively and with a fair and equitable outcome. We expect our suppliers and business partners to uphold these core principles as well.

## WHAT IF?

### Question:

*One of our clients is making insulting remarks to my colleague. I found them offensive and inappropriate but everyone else laughed. What should I do?*

### Answer:

Share your concerns with your line manager or Human Resources representatives. We cannot tolerate any form of harassment, even if the action comes from a customer, a supplier or anyone else in the workplace.



We respect and promote human rights consistent with the UN Guiding Principles on Business and Human Rights and the Ten Principles of the UN Global Compact.

#### Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights;

#### Principle 2:

make sure that they are not complicit in human rights abuses.



# Integrity & ethics in the workplace

## PERSONAL INFORMATION AND PRIVACY

We collect, store and process personal data of our employees, customers, suppliers and others. Sibelco is committed to protecting and using personal data in accordance with the law and with respect for privacy as a human right. We expect you to respect the personal information and privacy of others and to follow our standards and relevant [Group Data Privacy and Data Protection Policy](#).

Every employee is responsible for being familiar with applicable data protection and local privacy laws. Please liaise with the Legal Team for further guidance.

Any possible data breaches should immediately be addressed to the Legal Team and [compliance@sibelco.com](mailto:compliance@sibelco.com).

## PROTECTING OUR COMPANY

### WE SAFEGUARD OUR ASSETS

We all have the duty to protect Sibelco's property from risk or damage. Company assets may only be used for their intended purpose. Assets include physical assets, company information, research and technical data, technology, money, strategic and marketing plans, and other non-physical property.

We expect those who work with us to protect and not misuse our property. Any incident of fraud, loss, waste, damage, theft, or misuse should be reported immediately to your manager.

### WE PROTECT OUR INFORMATION SYSTEMS

Sibelco entrusts you with access to our data and systems through various tools required for the successful completion of your tasks. In the interest of yourself, your colleagues and the company, it is a condition of your engagement with Sibelco that you agree to use the tools and access in a

responsible way. This use also extends to cyber security and data breach risks that you are required to actively manage and report.

Please consult [Group Acceptable Use Policy](#) and report any suspected data or cyber security breaches immediately to the Legal Team or [compliance@sibelco.com](mailto:compliance@sibelco.com).

### WE MAINTAIN ACCURATE ACCOUNTING PRACTICES

Sibelco conducts accounting in an accurate manner and in accordance with all applicable laws and regulations. We maintain our accounts and financial statements to reflect actual financial information in accordance with International Finance Reporting Standards (IFRS).

### WE PROTECT OUR INTELLECTUAL PROPERTY

One of our most important assets is our intellectual property (IP). You may learn or participate in the development of IP such as patents and trade secrets. It is your responsibility to treat such proprietary information and intellectual property with the utmost care and caution in accordance with company policies and procedures.

Please consult the [Policy on Inventions and Patent Management](#) for more information.

### WE PRESERVE CONFIDENTIALITY

Our IP and any other confidential information is an important asset. Any information retained or generated by Sibelco is confidential and may not be disclosed. Any confidential or personal information is handled in accordance with our guidelines. Some examples include: Intellectual property, financial information, development of new markets, a proposed acquisition, merger, divestiture or strategic alliance, internal reports, customer and pricing information, and strategies and business plans.

Confidential information should be used only for company purposes and should not be disclosed to anyone outside of Sibelco. Even within the company, only those individuals who truly need to know the information should have access to confidential information.

Any suspected unauthorised disclosure of or access to Sibelco's confidential information should be immediately reported to your local manager and or the Legal Team in order to assess and mitigate the related risks of such disclosure.

You ensure that any confidential information is handled in accordance with [Policy on Confidentiality and Intellectual Property](#).

### WE PROTECT THE REPUTATION OF SIBELCO

Since 1872, we retain business on the strength of our reputation as a reliable company. All around the globe, we must keep in mind that this long reputation and industrial heritage are a shared responsibility.

# *Integrity & ethics in the workplace*

## PUBLIC RELATIONS AND EXTERNAL COMMUNICATION

We all represent Sibelco, but we communicate with the media via designated spokespersons only and in accordance with our communication policies.

With this in mind, we require all other employees to refrain from communicating as representatives of the company without first obtaining specific approval. Consistent with that, you should also ensure that your external communications (including online and social media posts) do not disclose confidential or proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of Sibelco, unless you are authorised to do so.

All information disclosed outside of the company must be accurate, complete and consistent. Anyone who receives a media inquiry must immediately inform the Group Communications Team and wait for further guidance.

## POLITICAL ACTIVITIES

Political activities must be conducted on your own time and using your own resources. You must not promote any political or personal views or beliefs (including by posting or distributing notices or other materials) on or around Sibelco premises, and you may not indicate or suggest that you speak for Sibelco or that the company supports your views. Prior approval of the Legal Team is needed where employees would represent Sibelco in social or economic advisory groups set up by government.

# Integrity & ethics in doing business

*We operate our business with integrity. We are committed to acting professionally, fairly and honestly. We prohibit corruption and bribery in all their forms and adhere to the Ten Principles of the UN Compact and applicable rules and regulations .*

## ANTI-CORRUPTION

We do not directly or indirectly give, offer or promise a benefit or anything of value with the intent or the effect to improperly influence a person to act in our favour. We do not request any person to make payments, promises or offers on our behalf and we never accept or receive bribes from government officials or private individuals.

Failure to comply with our **Anti-Bribery and Anti-Corruption Policy** may result in disciplinary action, up to termination of employment. Remember that, in certain countries, the law may hold Sibelco or individuals involved in corruption civilly or criminally liable. Any concern regarding corruption must be reported immediately

*In case of questions, please consult the Legal Team.*



### **The Principles of the UN Global Compact**

#### **Principle 10:**

Businesses should work against corruption in all its forms, including extortion and bribery.

## WHAT IF?

### **Question:**

*What is a bribe?*

### **Answer:**

A bribe is not only a payment in cash. It can take many forms including donations, offering employment outside the standard hiring process, travel, rebates, fees, loans or entertainment.

### **Question:**

*A government official asked me if I could help his son with employment at Sibelco. He said it would benefit the relationship. What should I do?*

### **Answer:**

Don't do it. It might be that the government employee will do something in exchange for your help and this could be viewed as a bribe. You can give the contact details of Human Resources representatives to the official. Please also inform the Legal Team of the conversation to decide if further action is needed.



# Integrity & ethics in doing business

## PAYMENTS AND GIFTS

Our ***Gifts, entertainment and hospitality Policy*** prohibits giving or accepting anything which unduly influences the judgment of the recipient by creating a disproportionate obligation to return a favour or by creating an appearance of impropriety. Further advice is available from Human Resources and the Legal Team.

## FAIR COMPETITION

Sibelco is committed to competing fairly to win business ethically, free from understandings or agreements that directly or indirectly restrict competition with competitors, suppliers or customers.

Compliance with these laws is of vital importance. Investigations by competition authorities may result in significant fines and costs, compensation claims by customers and competitors. Acts of unfair competition may also damage our reputation and commercial relationships.

We expect you to deal fairly with all our customers, suppliers and anyone else in procurement and sales related activities. In case of doubt, always consult the Legal Team.

Speak up if you see or suspect any unfair competition or anti-competitive behaviour by an employee or third party. Any breach of competition laws is regarded a serious breach of the Code of Conduct which may lead to disciplinary actions and sanctions including and up to immediate termination of the employment.

Find out more in the ***Competition and Anti-Trust Policy***.



## WHAT IF?

**Question:**

*In our culture it is normal to give and receive small gifts from clients. But the Code of Conduct indicates that this might be inappropriate. What can I do?*

**Answer:**

Giving or receiving a gift should always be in line with the policy. Prior to accepting or offering anything of value, you should seek approval from your line manager.

**Question:**

*I'm friends with the sales manager of a Sibelco competitor. Occasionally we talk about business. Should I be concerned?*

**Answer:**

Yes. You should refrain from discussing/sharing confidential and/or business sensitive information about Sibelco including without limitation company strategy, customers, pricing and other commercial terms and conditions. Furthermore, if you are party to a communication/ discussion with Sibelco competitors during which business sensitive information is shared or question raised, please expressly confirm you cannot engage in the discussion and remove yourself from the discussion. Subsequently, please inform the Legal Team of such an occurrence so the need for any formal follow up action can be evaluated.

## WHAT IF?

### **Question:**

*Your Cluster is looking for a new cleaning company. Your cousin owns a reputable and cost-effective cleaning company in your area. Can you recommend this company?*

### **Answer:**

You may of course recommend the company as we want to work with local and cost-effective companies, but you must disclose your relationship immediately. A conflict of interest may not always be obvious. Even the perception of a conflict could negatively affect you and Sibelco, causing severe reputational harm. Reach out to your manager and the Legal Team to discuss and agree on the best way forward.

# *Integrity & ethics in doing business*

## NO CONFLICTS OF INTEREST

All of us should avoid conflicts of interest and circumstances that present the appearance of a conflict. Ask yourself whether the action you are considering could create a personal advantage for you or anyone you know that interferes with the interests of Sibelco. If the answer is 'yes,' you should avoid it.

You also may not compete with Sibelco directly or indirectly or help any other party compete with us. We must always be able to demonstrate that we have acted in the interest of Sibelco and that all appropriate actions were taken to avoid a conflict-of-interest situation.

Please consult [Conflict of Interest policy](#) and [Gift, Entertaining and Hospitality Policy](#).

Every employee has the obligation to disclose a potential or actual conflict of interest to the line manager, Internal Audit or the Legal Team. Any exception always requires the approval of an Exco member.

## SUSTAINABLE SUPPLY CHAIN

We are committed to partnering with reputable suppliers that conduct their activities responsibly and sustainably. We work only with qualified third parties who have a commitment to ethics and integrity consistent with ours.

Sibelco expects all suppliers and subcontractors to share and respect the four pillars expressed in the [Supplier Code of Conduct](#) and we expect them to replicate these principles in their own supply chain. The Supplier Code of Conduct is a key factor in our selection and evaluation of suppliers and compliance with the principles in the Supplier Code of Conduct are a prerequisite for working with Sibelco.

If there is any doubt about a supplier's integrity, talk to your line manager. Speak up about any action by a supplier that is not consistent with our Code of Conduct.



# Integrity & ethics in doing business

## OUR GOVERNANCE

### SEGREGATION OF DUTIES

The integrity of Sibelco's Governance is based on segregation of duties. Compliance with this principle implies that it is forbidden for anyone to be in complete charge of a business transaction from beginning to end. All significant deviations from the segregation of duties should be reported immediately to your manager.

### DELEGATION OF AUTHORITY (DOA)

Each time we enter into a decision or business transaction on Sibelco's behalf, there should be

appropriate documentation recording such an agreement, decision or transaction. It shall be approved in accordance with the applicable DoA standards and principles. Never sign any contract on behalf of Sibelco unless all the conditions of the **Delegation of Authority Policy** are met.

Furthermore, any documents to be signed on behalf of a Sibelco company within the group, shall be executed by the legal representatives for such company thereto appointed in accordance with applicable local rules and regulations. For more information, please consult the Legal Team.

## WORKING WITH GOVERNMENTS

Sibelco is committed to developing and maintaining honest and constructive relationships with local governments. We share information and opinions in a transparent way. Only authorised colleagues are allowed to interact with governments and

any information provided to governments must be appropriate and accurate. This applies to all interactions, whether formal, informal or social in relation to Sibelco's business, including any kind of correspondence, whether in person, written or via electronic media.

## INTERNATIONAL TRADE CONTROLS AND REGULATIONS

Sibelco is committed to ensuring all import and export transactions comply with applicable local, regional and international trade control laws, restrictions and sanctions applicable to our activities. All Sibelco employees involved in international trading must comply with these laws, regardless of location. Make sure that accurate information is provided to the

competent authorities and do not proceed with a transaction if there is any doubt about compliance with trade control laws.

If we are involved in a transaction that breaches international trade laws, it may impact Sibelco's right to operate, and expose Sibelco civil and criminal liability including without limitation high penalties and to serious reputational damage.

Please consult **International Sanctions Regulations**.

## WHAT IF?

### Question:

**Who can sign this purchase agreement with this supplier in the UK?**

### Answer:

First, please ensure the appropriate internal approvals have been obtained pursuant to the DoA (which considers the type, amount and risk of the commitment) prior to proceeding with the signature of any agreement. Secondly identify the appropriate contracting legal entity on behalf of Sibelco and confirm whom can represent and sign in the name of and on behalf of such legal entity. Furthermore, the person having to approve per the internal DoA, the person able to sign the agreement and the person able to make the payments due under such agreement shall not be the same.

### Question:

**A mineral supplier offers you to purchase Barite for an exceptionally competitive price via one of his distributors in the Middle East. The offer seems appealing but when you ask him about the origin, the supplier tells you not to worry about it and that the customs import papers will be done properly.**

### Answer:

This proposal is suspicious and could lead to an unlawful shipment resulting into a potential breach of international trade sanctions as well as fines in addition to other penalties. Reach out to the Legal Team to discuss the proposal and define the next steps.





# Relationships with the community

## CARING ABOUT THE ENVIRONMENT

**Each one of us can be a leader for change. Sibelco is committed to a role of environmental leadership in all facets of our business. Our aim is to create a positive legacy and environmental sustainability is part of our Vision and one of our key focus areas.**

We aim to reduce the impact of our activities and to bring a positive contribution to the environments in which we operate. We focus on responsible, efficient mining and processing practices, qualitative rehabilitation and maximizing the value that the resources bring to our communities.

### How?

- Taking a whole of life approach and involving key stakeholders in the process;
- Understanding environmental challenges and take a precautionary approach to such challenges;
- Developing innovative, environmentally friendly flexible solutions to bring about change
- Striving to limit environmental footprint (e.g. restoration and rehabilitation of former quarries);
- Actively promoting biodiversity;
- Pro-actively managing projects including measuring and monitoring our progress for each project;
- Encouraging all partners to share in our mission.

Sibelco manages its environmental performance and requires all Sibelco operations to comply with Sibelco's environmental policy, associated guidelines and long-term sustainability strategy.

We provide more information and practices via ourSibelco where you can find detailed information on our overall efforts. Learn more [Environmental Policy](#).

Where actual or potential environmental incidents occur, you must report these immediately to your line manager and the Sustainability team.



Sibelco is a participant of the UN Global Compact including the 3 environmental principles.

#### **Principle 7:**

Supporting a precautionary approach to environmental challenges;

#### **Principle 8:**

Undertaking initiatives to promote greater environmental responsibility

#### **Principle 9:**

Encouraging the development and diffusion of environmentally friendly technologies.

# Relationships with the community

## COMMUNITY ENGAGEMENT

We aim to build open and long-term relationships with local communities and strive to create added value to social development.

It is important for Sibelco to act responsibly and maintain and enhance our social license to operate. We engage proactively with the communities in which we operate. We create partnerships at global and local level that are aligned with our values and way of working.

 BUILDING OPEN AND LONG TERM RELATIONSHIPS





# Upholding the law

## LEGAL COMPLIANCE

We all have the responsibility to work in accordance with the Code of Conduct, as well as within the law. Sibelco is committed to full compliance with all local norms, rules and regulations where we operate.

Timely legal consultation is essential to ensure that Sibelco's legitimate business interests are protected. If you have any questions or need further information, please speak to your line manager or get in touch with the Legal Team.

## AUDITS AND INVESTIGATIONS

Each Sibelco employee has a duty to report any type of misconduct and if asked to do so, to participate in an audit or internal investigation. Each employee is expected to cooperate fully and honestly.

Failure to cooperate or intentionally mislead investigators may result in disciplinary action. If you receive a request directly from a regulator or external lawyer in connection with an alleged claim, legal proceeding or government investigation, you should immediately contact the Legal Team.

## DISCIPLINARY ACTIONS

We expect all employees to act in accordance with the Code of Conduct while working for Sibelco. There are no exceptions. Engaging in misconduct may result in Sibelco commencing an investigation and if the facts substantiate the misconduct or breach, Sibelco will take corrective action and, where appropriate and subject to local regulation, disciplinary sanction from warning to termination of employment.

## WHAT IF?

### Question:

*I am new to Sibelco. I know we have policies and work instructions, but can you remind me where I can find guidance in case of questions?*

### Answer:

It is everyone's responsibility to familiarise themselves with the Sibelco Policies and Work Instructions. Your manager and HR will guide you through the Sibelco's organisational model as part of your onboarding plan and training. In case of doubt, you can always ask your manager, HR representatives or colleagues for advice.







# Voice your concerns

**We value feedback and we invite you to speak up when you encounter behaviour in the workplace that is unethical, illegal or goes against the Sibelco values or our Code of Conduct.**

If you suspect or become aware of any potential wrongdoing, speak up and report it. You can contact your line manager, Human Resources representatives for work-related matters, Internal Audit or the Legal Team. Sibelco is fully committed to respecting the confidentiality of colleagues who report such matters and to ensuring that there is no retaliation against employees who raise concerns. If you witness or are the subject of retaliation, it is important that you report it immediately.

If you are unable to or uncomfortable with speaking to your local manager or the other internal reporting lines, you can report your concern [HERE](#). This global reporting service is run by Convercent, an independent third party, and allows you to report online or by phone call. The Reportline is available 24 hours a day, 7 days a week and allows you to report in various languages, confidentially and, where permitted by law, anonymously.

All concerns will be treated seriously and respectfully. All information you give will be kept confidential, without compromising the need to conduct adequate investigations, during which all applicable data protection and privacy, confidentiality and employment rights will be respected. Depending on the nature of the reported issue, Sibelco's Legal Team, HR or Internal Audit will be responsible for ensuring that complaints and questions are investigated and resolved properly. For more information refer to the [Whistleblowing Policy](#).



### How can you share your concerns?

- Speak to your line manager or to a member of Human Resources representatives, Internal Audit or the Legal Team**
- Get in touch online using our independent global reporting service [convercent.com/report](https://convercent.com/report)**
- Call the Reportline number check [convercent.com/report](https://convercent.com/report) to find your local phone number**

## WHAT IF?

**Question:** *I suspect but I am not certain that my supervisor is violating the Code of Conduct. What should I do?*

**Answer:** If you suspect a violation and have reasonable grounds to believe, considering the circumstances, that the information available to you constitutes a violation, speaking up is the best way forward. It is better to report a potential violation than to put the company at risk. We will investigate any reporting in 'good faith' and take appropriate action.

# No tolerance for retaliation

*We value your help in uncovering possible misconduct, but we know that raising an issue takes courage.*

It is important to us that you feel empowered and protected when you report a suspected wrongdoing. We will not tolerate threats or retaliation against anyone who makes a good-faith report or participates in an investigation. No action will be taken against an employee who expresses a concern that was found to be inaccurate if the concern is expressed in good faith. As long as you do not knowingly make a false report, you can speak openly without fear of retaliation. [Please consult the Non-Retaliation Policy](#)



## WHAT IF?

### Question:

*What is retaliation?*

### Answer:

Retaliation occurs when an employer takes an action against an employee because he/she engaged in a good faith report or investigation. Retaliation can take many forms such as terminating, job reassignment, threats, intimidation, harassment or humiliation, it is a serious misconduct and will not be tolerated. Any Sibelco employee who is seen to retaliate will be held accountable.

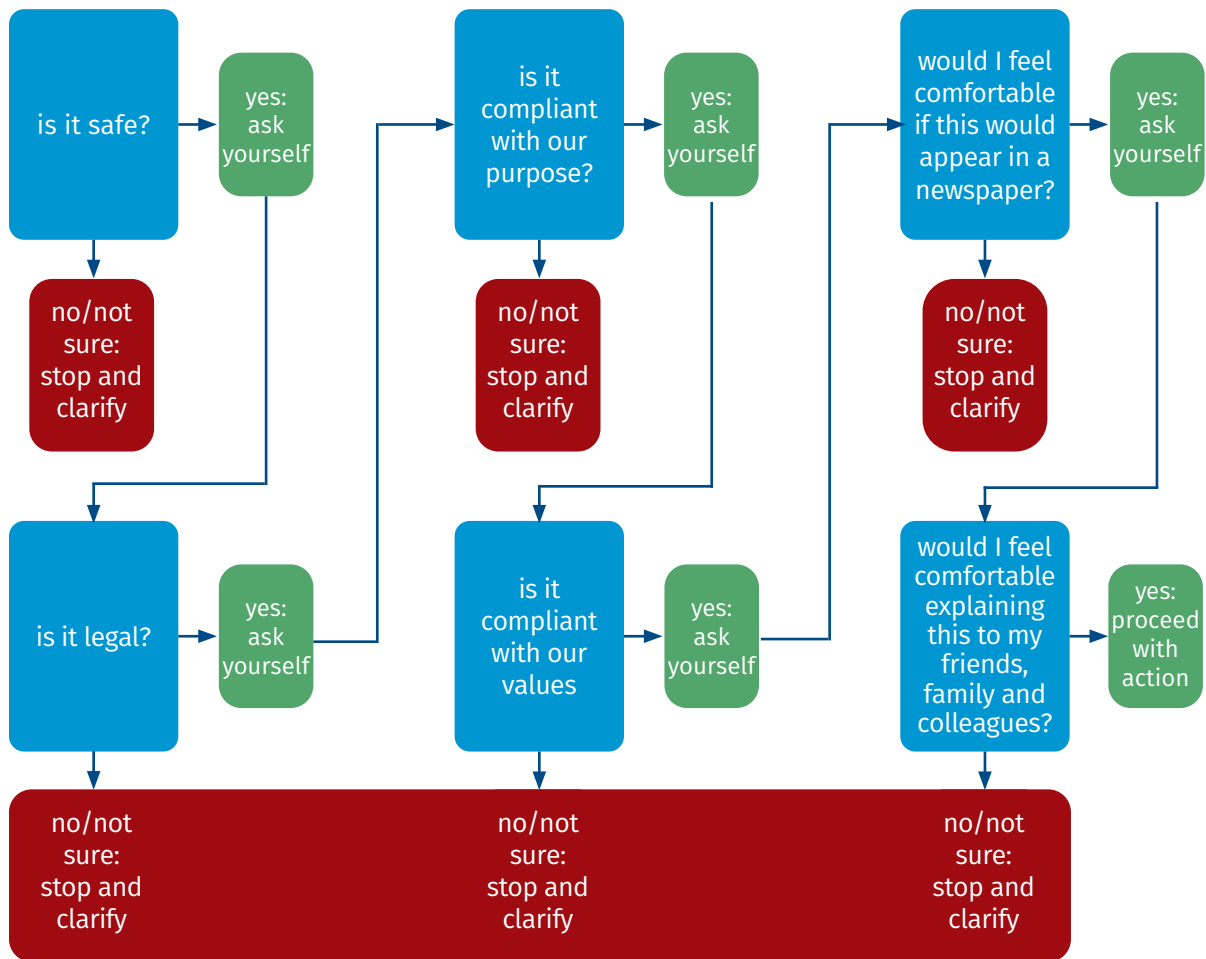
### Question:

*Can I get dismissed if I report that I think our financial statements are incorrect?*

### Answer:

When the concern is reported in 'good faith,' dismissing you for reporting would be considered retaliation. But, as much as we value honest reporting, we do not tolerate knowingly reporting false accusations.

# Upholding the Code



The Code of Conduct is a guidebook for putting our values into practice, providing a framework of “musts” and “must nots.” This Code is a great resource but will not cover all the issues we may face on the job, and we might still find ourselves in a situation of doubt.

Not all situations are straightforward – how do you make the best choice when facing difficult or unclear circumstances? The decision flow hereunder helps us make good decisions when facing such dilemmas.

***If you are unsure, please ask your line manager, the Legal Team, Human Resources representatives or Internal Audit for guidance.***