

# PPG Global Speak Up Policy

## English



We are all here, helping to protect and beautify the world the right way, The PPG Way. We accomplish this when we act with integrity and in accordance with “PPG’s Global Code of Ethics” every day.

We are depending on one another to be courageous and to speak up if we have questions or concerns about ethical misconduct. It is a critical part of honoring our commitment to do business the right way and a responsibility and obligation that we all share.

When we speak up, we make PPG a better place to work and we do right by everyone who depends on us, including our customers, our fellow employees, and our stakeholders. We also enable PPG to address concerns and help resolve issues early. The sooner we raise concerns, the sooner PPG can work to begin making things better.

# Introduction

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## Purpose

- **SPEAK UP:** This global policy outlines the principles for internal reporting of suspected misconduct, a suspected violation of laws or regulations or other suspected violation of the PPG Global Code of Ethics (“GCOE”).
- **LISTEN UP:** This policy describes the process we use to appropriately address reports.
- **FOLLOW UP:** This policy explains PPG's commitment to protect reporters from retaliation and to take appropriate corrective action for all substantiated violations.



Wallet Card



Speak Up Poster



Ethics Helpline Sticker

You can order these materials through PPG's corporate Ethics and Compliance SharePoint site.

# Definitions

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## **Who is a Reporter?**

A reporter is an individual who reports in good faith to a PPG reporting channel information about a suspected misconduct, suspected violation of laws or regulations or other suspected violation of the GCOE committed by a PPG employee or by a third-party, such as a contractor, a supplier, a distributor or any other person or entity conducting business with PPG.

## **What is Good Faith?**

“Good faith” means the genuine belief that suspected misconduct or a suspected violation has occurred and the sincere intention to be honest and accurate in any report about such misconduct or violation.

## **What is Misconduct?**

For the purpose of this policy, misconduct means any conduct that does not comply with the applicable laws, regulations, company policies and procedures, or the standards set forth in the PPG GCOE. Some examples include fraud, theft, corruption, workplace violence, discrimination, harassment, misuse of company resources, conflicts of interest, unauthorized transfer or use of PPG confidential information, improper accounting practices, and other unethical behaviors. Misconduct can also include intentional violation of PPG safety rules.

## **What is Retaliation?**

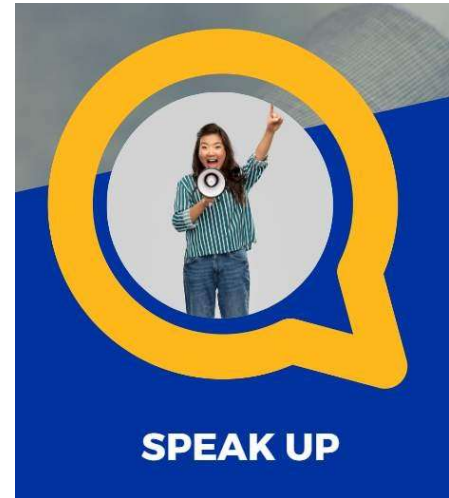
Retaliation means a specific, adverse action taken by a company or an employee against another employee, such as termination, demotion, suspension, or other forms of punishment, in response to their protected activities, such as reporting misconduct, participating in whistleblowing, filing a complaint, or asserting their legal rights. Retaliation can also include subtle or indirect actions against an employee, such as excessive scrutiny of performance, biased feedback that undermines professional reputation or prospects for promotion, undesirable job assignments that limit opportunities for professional growth, withholding of support or training otherwise provided to similarly situated colleagues, or other acts of hostility such as exclusionary behavior, rude or dismissive remarks or constant criticism from colleagues or supervisors creating a toxic and unpleasant workplace.

# Speak Up

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## Why is it important to Speak Up?

- You are doing the right thing to protect yourself, your colleagues who may also be exposed, and the company.
- It is a critical part of honoring our commitment to do business the right way and a responsibility and obligation that we all share.
- We make PPG a better place to work and we do right by everyone who depends on us, including our customers, our fellow employees, and our stakeholders.
- We enable PPG to address concerns and help resolve issues early - the sooner we raise concerns, the sooner PPG can work to begin making things better.



### **DO NOT USE THIS POLICY**

- To report events presenting an immediate threat to life or property - if you need emergency assistance, please contact your local authorities, or call your country emergency phone number.
- For any grievances you may have in relation to your terms of employment.
- To settle personal disputes.
- To make accusations that you know are false. Doing so may lead to disciplinary measures.

## How can you SPEAK UP at PPG?

PPG offers various internal reporting channels so that the reporter can always find a safe way to raise a concern, whether at the local, regional, or corporate level.

- Your supervisor or others in your management line
- Your Human Resources representative
- Any member of the “PPG Law and Compliance Department”
- By using the PPG Helpline (see below)
- By email to “[ChiefComplianceOfficer@ppg.com](mailto:ChiefComplianceOfficer@ppg.com)”

Reporting misconduct in which you may have played a role does not allow you to escape responsibility for your own actions. However, your act of self-reporting will be considered as a mitigating factor in any resolution of the report.

### **Local Reporting Channels**

Often, the best way to get your concerns addressed quickly and directly is to contact your supervisor who may be able to address your concern or engage the appropriate individual or team who can. If you are uncomfortable approaching your immediate supervisor for any reason, then you can raise your concern with any other member of management or someone from the HR, or Legal and Compliance functions.

“**Facilitator**”: In some countries, you can contact a local facilitator - a further point of contact for you to raise concerns about suspected misconduct, for example, when you want to avoid raising a concern to your direct supervisor. Facilitators are there for you to discuss your concerns in confidence and advise on any next steps. Facilitators do not participate in any investigation so that your conversations remain confidential. Please contact your local Human Resources representative for information about how to contact your facilitator (if your country has one).

### **PPG Ethics Helpline**

We recognize that a reporter may sometimes feel more comfortable reporting a concern anonymously or to someone outside the local organization, especially when the concern may involve another member of the local organization. The “PPG Ethics Helpline” is available to anyone, inside or outside of PPG, and is managed by an independent third party to provide a

platform for reporting concerns confidentially and in your own language to the PPG Law and Compliance Department for further handling. The Helpline can also be used to simply ask for guidance and advice. After you complete your report through the Helpline (online or by phone), you will receive a unique code assigned to your report. You can use this code to call back or access the website ([www.ppgethics.com](http://www.ppgethics.com)) to check progress on your report. You can see whether the person dealing with your report has feedback for you or further questions. If you want, you can provide additional information. Your report code is particularly important if you choose to remain anonymous, because we can only contact you through the Helpline system.

## What does a reporter see when using the Ethics Helpline?



Welcome to the PPG Ethics HELPLINE - Questions and Concerns Portal

The screenshot displays the PPG Ethics Helpline portal interface, which is divided into three main sections:

- Ask a Question:** This section features a question mark icon and a text box for users to enter their questions. An example question is provided: "Can I accept a gift from a vendor our organization is considering doing business with?". A green "Ask a Question" button is located at the bottom of this section.
- Report an Incident:** This section includes a document icon and a list of incident types such as financial and auditing concerns, harassment, theft, substance abuse, and unsafe conditions. It contains a two-step process: 1. "Select your location" with a dropdown menu, and 2. "Where did the incident occur?" with another dropdown menu. A green "Get started" button is positioned at the bottom.
- Check Status:** This section has a magnifying glass icon and explains that users can check the status of their reports using an access number and password. It includes input fields for "Access Number" and "Password", a "Forgot your password?" link, and a dark grey "Check status" button at the bottom.

## How do I start a report using the PPG Helpline?

Please click on the link

[PPG\\_HELPLINE](#)

## **External Reporting**

We strongly encourage employees to raise concerns internally through one of the internal reporting channels to give the company a chance to review the matter and act consistent with our key values. In some situations, for example, if your internal report is being neglected or no action has been taken, or if there is a serious risk of retaliation, you may want to raise your concern externally, for example, to official institutions or entities appointed by your local authorities.

## **Confidentiality and Anonymity**

We understand that reporters may fear retaliation, and we are committed to protecting their identity and ensuring confidentiality. Reporters can choose to remain anonymous when allowed by local country law when reporting concerns, and we will not disclose their identity without their consent, except where required by law. PPG however, encourages reporters to reveal their identity because anonymous reports can make it difficult to carry out a good investigation and to resolve the reporter's concerns.

# Listen Up



PPG takes every report of suspected misconduct seriously. If you submit a report, you will receive a confirmation of receipt. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. PPG will make every effort to maintain your confidentiality. PPG carefully selects those who receive your report (on a need-to-know basis), and they are responsible for ensuring that your report is handled properly and that you are treated fairly in the process. On average, closure of the matter can be expected within one to three months. You will be informed of the overall findings, but we may not be able to give you full details of

the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

All reports and investigation details are maintained in a secure location, and PPG commits to the general principles on confidentiality.

## What is expected of you in connection with an investigation?

If you become involved in an investigation, it is your obligation as a PPG employee to be truthful and forthcoming and answer all questions completely and honestly. Lying to or deliberately withholding relevant information to the people performing the investigation, as well as delaying, interfering with or refusing to cooperate with an investigation, may lead to disciplinary measures. All parties involved, including the subject of the report, are entitled to confidentiality to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

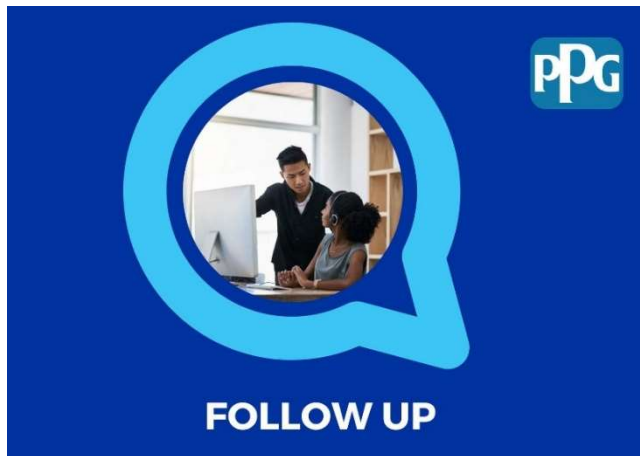
**PPG** You reported an ethics concern. What happens next?

1 You just reported an ethics concern through the Helpline. You might be wondering what to expect.



# Follow Up

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When reports are directed to the Law and Compliance Department, the Law and Compliance Department and/or Human Resources Department review the investigation process, the findings and the proposed discipline or other corrective actions that result from the report to ensure the integrity and consistent application of the investigation and resolution process worldwide. Resolution of a report may

involve disciplinary actions against one or more responsible parties including oral or written warnings, coaching, suspension, performance rating impact, financial penalty, or termination of employment or other business relationship. Resolution may also involve other corrective measures to reduce the likelihood of future misconduct or violations, such as specialized training, new or improved controls, or strengthening of processes or procedures.

## **We do not tolerate retaliation.**

It is against PPG policy to retaliate against anyone for making a good-faith report of a suspected misconduct or a violation of law, regulation or PPG's Global Code of Ethics.

We will not tolerate retaliation at PPG. Individuals who report concerns honestly and to the best of their knowledge should never be treated unfairly. If you feel that you are being treated differently because you have made a report or asked a question, immediately share this concern with the Law and Compliance Department or one of your other PPG reporting resources. Reporters who experience retaliation are protected by PPG because retaliation against a reporter is considered a violation of PPG's Global Code of Ethics and can lead to disciplinary action. PPG will ask you during and after the investigation process if you have experienced any form or retaliation, and we will document our actions. Even if your good faith concern turns out to be incorrect or unjustified, PPG will ensure that you do not face retaliation for raising the concern. You should be aware that in some countries, civil or criminal penalties can be imposed for obstructing or attempting to obstruct reports of misconduct.

# Data Retention, Data Privacy

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## Data Retention

Reports and related information will be retained for as long as necessary to investigate and address the concerns raised, and to comply with any applicable legal or regulatory requirements. After that, reports and related information will be securely destroyed or deleted in accordance with PPG's data retention policies.

## Data Privacy

Reports made under this policy may contain personal information of whistleblowers, subjects and third parties (such as witnesses). PPG is committed to protecting the privacy of all such individuals and to safeguarding the confidentiality of the reports. Any personal information collected during the handling of a report will be processed in accordance with applicable data protection laws and PPG's privacy policies by the PPG entity that employs you and may be shared with those relevant PPG entities who participate in the investigation process. We always attempt to limit the types and amount of personal information used. We also ensure that access to reports and related information will be restricted to authorized personnel who have a legitimate need to know to investigate and address the concerns raised. In limited circumstances, we may share personal information externally with third parties to assist us in carrying out complex investigations. We always do so in accordance with applicable law and subject to strict requirements of confidentiality. If you wish to know more about data privacy or to exercise rights available to you under applicable law, please contact us at [privacy@ppg.com](mailto:privacy@ppg.com).

## Questions?

If you have any questions or concerns about this policy or its implementation, please contact PPG's Law and Compliance Department at [ChiefComplianceOfficer@ppg.com](mailto:ChiefComplianceOfficer@ppg.com).

Further guidance with respect to this Policy is available under the "Global Code of Ethics" section at [www.ppg.com](http://www.ppg.com). The entire Code, in multiple languages, is available on this website.

