

# Confidential Reporting (Whistle-blowing) Hotline Policy, Procedures and User Guidelines

September 2020

For Internal and External Publication

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For Internal and External Use

## INTRODUCTION

All organisations face the risk of things going wrong because of genuine mistakes and misunderstandings or deliberate malpractice. The officers and directors of Promethean<sup>1</sup> believe that our company has a duty to identify such situations, and take appropriate remedial measures, and by knowing about such matters at an early stage, Promethean is better placed to protect itself and limit the impact on others.

Encouraging a culture of openness is an important part of this process, and Promethean encourages its employees and those with whom it does business to raise any concern they may have in relation to how Promethean operates as a business. This policy establishes the means to do so. It supports the Code of Ethics and Standards of Business Conduct (the "Code of Ethics"), and is similarly applicable to Promethean employees and external parties doing business with Promethean, such as its customers and suppliers.

If there is any practice or behaviour that you reasonably consider is contrary to the Code of Ethics or constitutes an unlawful activity that Promethean should know about, please use the procedure set out in this policy document<sup>2</sup>. The reporting of genuine and reasonable concerns will not adversely affect your employment or business relationship with Promethean.

## POLICY & PROCEDURES

### 1. GUARANTEE

Employees may, quite understandably, be worried that reporting their concerns will put them at risk of victimisation or other detriment, or even put their job at risk.

**Anyone raising a genuine concern using the process set out in this policy document will not suffer victimisation or other detriment as a result of doing so.**

All concerns properly raised under this policy will be treated seriously and in confidence. Unless required to do so as a matter of law or to correct or remediate a situation that puts any person or Promethean at risk, neither Promethean nor its external hotline reporting partner will disclose any information, other than in accordance with the terms of this policy, without the prior consent of the person who raised the concern.

### 2. REPORTING PROCEDURES

Any person concerned about malpractice or unlawful behavior involving or relating to Promethean or its dealings with customers, suppliers or business partners should follow the procedure set out below.

#### 2.1 Promethean Employees

**Stage 1** - Tell your immediate supervisor or line manager.

You should normally raise any concern with your immediate supervisor/line manager in the first instance.

There is no specific procedure for doing this: concerns may be expressed verbally, or put in writing, should you prefer. Please be as clear and specific as you can when assembling information to support or explain your concern.

If your supervisor/line manager is not contactable, your concern relates to him/her, or it is inappropriate to involve him/her for some other reason, you should go directly to stage 2 in the escalation process.

**Stage 2** - Use the external or internal confidential reporting hotlines.

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<sup>1</sup> For the purposes of this policy, "Promethean" means Promethean World Ltd. and all subsidiaries thereof from time to time.

<sup>2</sup> If you have a complaint about your own personal circumstances, you should contact your local People Team member. The Confidential Reporting (Whistle-blower) Hotline should be used only to raise concerns about malpractice or unlawful behavior within Promethean.

**External reporting hotline:** Promethean has invested in an externally operated confidential reporting hotline to provide additional reassurance that reports will be dealt with in confidence and that they can be made anonymously (where legally permitted). Reports can be made by telephone, email or web portal. The service is provided by SafeCall, and operates 24 hours per day, 7 days per week, and 365 days per year. It is available in a wide range of languages using interpreters during live calls and a multi-language web portal for online reporting.

Contact details are provided here:

Telephone: The hotline is available via toll-free telephone numbers in the following countries:

Australia 0011 800 72332255 Bahrain 8000 4264 Canada 1 877 599 8073 China Unicom 10800 744 0605 China Telecom 10800 440 0682 France 00800 72332255 Germany 00800 72332255 Italy 00800 72332255 Singapore Singtel001 800 72332255 Singapore MI 002 800 72332255 Spain 00800 72332255 UK 0800 915 1571 US 1 866 901 3295

Email address: You can make a confidential report to SafeCall via email at: [promethean@safecall.co.uk](mailto:promethean@safecall.co.uk).

Web portal: You can make a confidential report in one of 40 languages at the following website; Hold down "Ctrl" and click on this link, and follow the instructions in your chosen language: [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

**Internal reporting by e-mail:** Promethean also provides a confidential internal e-mail address: [confidential\\_wb@prometheanworld.com](mailto:confidential_wb@prometheanworld.com).

Access to any message sent to this email address is restricted to Promethean's General Counsel and Chief Human Resources Officer. Upon receipt of any e-mail sent to this confidential internal e-mail address, Promethean's General Counsel and Chief Human Resources Officer will together decide on the best course of action in response to any concern raised.

**Stage 3** - If you are still concerned.

If you have raised your concern via Stage 1 and/or 2 of the process but are not satisfied that it has been addressed adequately, or you believe that the matter is so serious that it cannot be raised through these Stages, you should raise it in writing directly with the Chief Executive Officer of Promethean.

**Stage 4** - If your concern has not been resolved by following Stages 1, 2 or 3 of the process.

If you feel that you have been unable to resolve your concern satisfactorily despite following the process through the Stages outlined above, you should provide a written summary setting out your specific concern, the senior managers and directors with whom you have raised it, and the reasons for your continued concern. This summary should be sent marked "Strictly private and confidential; to be read by addressee only" to the Board of Directors c/o the Company Secretary at the address provided below.

### Raising Concerns Anonymously

You may raise your concern anonymously in jurisdictions where this is legal, but you should be aware that this may prevent you being contacted for further information or to tell you what action is being taken. The external hotline service provides mechanisms that enable complete anonymity while facilitating contact between the reporter and the company. If you do choose anonymity, you should still follow the process Stages set out above.

## 2.2 External Parties

Promethean's external confidential reporting hotline is available for the use of external parties, such as suppliers, customers and business partners, who wish to report wrongdoing that involves or affects Promethean. The multi-language web portal is available for reporting by third parties.

Alternatively, any external party wishing to raise a concern under this policy can address it to Promethean's General Counsel at the address shown below.

### 3. HOW PROMETHEAN WILL RESPOND

All supervisors, managers and directors are required to ensure that this policy is followed when a concern is raised regarding malpractice or unlawful behaviour within Promethean. Complaints about personal circumstances are raised through your local People team member.

Confidential hotline reports must be investigated in accordance with this policy. This will normally involve making internal enquiries to establish basic facts. More detailed enquiries may then be considered necessary, and these may be formal or informal.

When conducting any investigation, advice and guidance should be sought from Group People and/or the Legal Department where necessary to ensure that the matter is fully and effectively investigated.

The person who initially raised the concern will normally be told about the outcome of any investigation if it is appropriate and legal for Promethean to do so. However, information will not be given out if, for instance, doing so would infringe the duty of confidentiality owed to others.

A central record of concerns raised under this policy will be maintained by Promethean's General Counsel. To ensure that this is complete, any supervisor, manager or director involved in a confidential reporting investigation that does not progress beyond Stage 1 of the above process must notify Promethean's General Counsel that an issue has been raised and resolved locally.

### 4. CONTACT DETAILS

As at the date of issue of this policy, the individuals to whom you should address your concern if it has not been, or cannot be, resolved by your immediate supervisor/line manager are as follows:

**General Counsel** - Allyson Krause, [Allyson.Krause@prometheanworld.com](mailto:Allyson.Krause@prometheanworld.com)

**Chief Human Resources Officer** - Ronan O'Loan, [Ronan.OLoan@prometheanworld.com](mailto:Ronan.OLoan@prometheanworld.com)

**Chief Executive Officer** - Vin Riera, [Vin.Riera@prometheanworld.com](mailto:Vin.Riera@prometheanworld.com)

**Board of Directors, c/o the Company Secretary** (via post).

All of the above can be contacted by mail or courier at Promethean's registered office at:

Promethean House  
Lower Philips Road  
Whitebirk Industrial Estate  
Blackburn, United Kingdom, BB1 5TH  
Tel: +44 (0)1254 676921

Alternative addresses in the U.S. at:

4550 North Point Parkway, Suite 370  
Alpharetta, Georgia 30022

720 Olive Way, Suite 1500  
Seattle, Washington 98101

All correspondence should be marked "**Strictly private and confidential. To be read by addressee only.**"

## USER GUIDELINES

### 1. WHAT IS (AND WHAT IS NOT) A REPORTABLE MATTER UNDER THIS POLICY?

The following examples are indicative of the types of concern that should and should not be raised via the confidential reporting hotline policy. The items listed are for illustrative purposes only, and the list is not intended to be exhaustive.

Situation	Is this a matter for the Reporting Hotline?
You have information that leads you to believe that a Promethean product presents a health and safety risk to users, that the company is aware of safety concerns, and that it is choosing not to address the situation.	<b>Yes.</b> Promethean is committed to the highest health and safety standards in the production, distribution, and use of its products.
You have evidence to suggest that Promethean's equal opportunities policies are being deliberately circumvented leading to discrimination against certain groups of employees and potential recruits.	<b>Yes.</b> Discrimination on almost any basis is against the law in many countries, and is certainly contrary to Promethean policies and Promethean culture.
You have reason to believe that a business partner's sales representative has knowingly provided a potential customer with incorrect information about Promethean products in order to close a sale.	<b>Yes.</b> Promethean's reputation is at risk.
A supplier's sales representative offers you an all-expenses paid holiday in exchange for your assistance in getting a contract placed with that supplier.	<b>Yes.</b> Promethean is at risk if it enters into business with a dishonest supplier.
You have reason to believe that building and decorating works at a senior colleague's house were invoiced to (and paid by) Promethean as part of charges for refurbishment work at a Promethean office.	<b>Yes.</b> It appears that a supplier may have been complicit in malpractice, the employee is taking advantage of their position in the company, and their relationship with the supplier which could be seen as a bribe.
You believe that you are being paid less than a colleague carrying out a very similar role.	<b>No.</b> This should be raised via your local People team member.
You feel that your first preference dates for annual leave are always turned down as your manager "always goes away for those two weeks."	<b>No.</b> This should be raised via your local People team member.
You suspect a colleague of stealing cash and personal items from other employee's desks after hours.	<b>No.</b> Malpractice by an individual acting for his own benefit and not involving anybody outside Promethean should be raised directly with your local People team member.

## 2. HOW SHOULD I RESPOND TO SOMEONE RAISING A CONCERN UNDER THIS POLICY?

### DO:

- Ensure any conversation is in private (even off site, if appropriate);
- Listen carefully, and question to find out as much information as you can;
- Decide at an early stage whether the issue is a confidential reporting hotline matter or a personal grievance. In the latter case, refer the employee to your local People team member;
- If you decide the issue is a confidential reporting hotline matter, make a timely, written record of any conversation;
- Act upon the information promptly, and investigate the issue thoroughly;
- Assess the possible motives of those involved, including the individual making the report;
- Consult the General Counsel and/or the Chief Human Resources Officer, if it is appropriate to do so; and
- Respect confidences at all times.

### DO NOT:

- Be judgmental;
- Promise action that you cannot deliver;
- Give an opinion until you have all the facts;
- Share or discuss the matter with colleagues at large;
- Email any details of the allegation or investigations, except as required by Section 3 below; or
- Delay dealing with or reporting the matter.

## 3. HOW DO I, AS A MANAGER, MAKE A REPORT UNDER THIS POLICY?

Having decided that the confidential reporting hotline policy applies to the concern raised, and after completing the investigations that you feel are necessary and appropriate, you should prepare a summary email outlining:

- The nature of the allegation and supporting “evidence” presented;
- The investigatory measures you took subsequently (interviews, reviews of paper or electronic records, etc.) and your findings;
- Any consultation with other Promethean employees; and
- Your assessment of whether Promethean is at risk or whether the matter was raised due to genuine misunderstanding, malice or for some other reason (you may wish to speak to your local People team member if you are worried about the individual or their behaviour).

The email summary should be sent to [confidential\\_wb@prometheanworld.com](mailto:confidential_wb@prometheanworld.com).

It is not necessary to identify the individual who raised the concern. You will be contacted if further follow-up is considered necessary.

**If at any time you feel out of your depth or uncertain about how best to proceed when a concern has been raised under the confidential reporting hotline policy, you must escalate the matter to Promethean’s General Counsel or the Chief Human Resources Officer without delay.**