

KNAUF GROUP

Speak-Up Policy for External Stakeholders

Version	1.0
Last revised	01.06.2023
Status	Executed

GENERAL

Brief Summary	Policy for dealing with the Knauf Speak-Up Line for external stakeholders
Policy Type	Group Directive
Policy Owner	Chief Compliance Officer
Policy Approver(s)	General Partners; General Counsel
Related Policies & procedures	Knauf Group Speak-Up Policy for Knauf Employees and former Employees
Storage Location	Knauf Intranet / Knauf DMS
Scope of Application	All Knauf Companies worldwide
Classification Level	☒ public ☐ internal ☐ restricted ☐ confidential
Date of Validity of this Version (Gebr. Knauf KG)	01.07.2023
Review Cycle	annually

REVISION HISTORY

Version ID	Date of Change	Author	Rational

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1. INTRODUCTION

Integrity, transparency and trust are essential for all our actions and are deeply incorporated into all our business relationships. KNAUF does not tolerate violations of law, internal policies, or ethical principles.

KNAUF is aware that sometimes there may be things that go wrong or where there is potential for improvement. The sooner we know, the sooner we can take necessary remedial actions.

To meet our high standard, we provide the KNAUF Speak-Up Line to all our employees, customers, suppliers and other stakeholders. We encourage everyone to make use of this opportunity and to submit a report or to contact our hotline in accordance with the terms of this Policy.

Every report is an important contribution to maintain a safe and trustworthy environment for KNAUF and its stakeholders.

The purpose of this Speak-Up Policy is to explain how customers, suppliers and other external stakeholders can raise concerns in confidence and without any retaliation.

2. SPEAKING UP

Any KNAUF customer, supplier or other external stakeholder who wants to make a Speak-Up report can follow the process described in this Speak-Up Policy. The use of KNAUF Speak-Up Line is not mandatory. There are alternative ways to raise concerns/complaints (e.g., management, , etc.). Other local Speak-up Lines may also exist in some KNAUF companies.

Examples of concerns are:

- criminal activity (felony or misdemeanor), or
- a serious and apparent violation of laws or regulations, or
- a situation which could present a threat or cause serious harm to the public interest (relating to public health, safety or welfare), or
- behavior which violates the KNAUF Code of Conduct, or
- potential or actual serious violation of human rights or fundamental freedom or,
- potential or actual serious violation relating to health and safety or to the environment, or
- the deliberate concealment of any of the above matters, or
- retaliation for making a Speak Up report or participating in its handling

A KNAUF customer, supplier or other external stakeholder is acting "in good faith", when he or she provides information which he or she believes to be comprehensive, fair and accurate that he or she can reasonably believe in the truthfulness of the information given, even if it later turns out that he or she was mistaken. If a KNAUF customer, supplier or other external stakeholders discovers, after submitting a Speak-Up report, that he or she was mistaken, he or she must immediately notify the investigator to whom the report was submitted.

3. ANTI-RETALIATION

KNAUF will not tolerate retaliation against anyone for raising concerns in good faith regarding an actual or suspected violation of law, internal policies or ethical principles. KNAUF also strictly prohibits any retaliation against anyone who assists with any inquiry, concern, or investigation of any violation.

4. PROCEDURES

4.1 How to speak up?

The KNAUF Speak-Up Line makes it easy to report a potential compliance incident or ask a question. The Speak-Up Line is available 24/7, 365 days a year.

There are two ways to ask a question or submit a report through the KNAUF Speak-Up Line:

 Website	Speakup.knauf.com
 By Phone	(GER) 0800 181 2396 If a customer, supplier or other external stakeholder is dialing internationally, he or she can choose the location from the list for the international number assigned to the country on Speakup.knauf.com

4.1 What kind of information must be provided?

When a KNAUF customer, supplier or other external stakeholder files a report, he or she must provide as much detailed information as he or she can to enable KNAUF to assess and investigate the concern, such as:

- the background and reason for the concern;
- names, dates, places and other relevant information; an
- any documents that may support the questions or report.

A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

5. RECEIPT AND TREATMENT OF COMPLAINTS

KNAUF Compliance will notify the reporter and will confirm receipt of the reported incident within seven days and may appoint an investigator or team of investigators, including staff with experience of investigations or special knowledge of the subject matter.

KNAUF Compliance treat all parties involved including reporters and witnesses in an investigation fairly, transparent and respectfully and let the facts produced by the investigation determine if any remedial measures should be taken. The person who raised the concern will be informed when the investigation is completed and appropriate information will be communicated. In most cases specific results need to remain confidential depending on the nature of information.

6. PROTECTIVE MEASURES

6.1 Confidentiality

Any information about the reported concern, including the identity of those involved in an investigation, shall only be disclosed on a need-to-know basis. Information will only be disclosed outside this small group

of investigators if KNAUF is required to do so by law. The authorized persons and the persons handling KNAUF Speak-Up reports are bound by strict confidentiality obligations.

6.2 Anonymous report

KNAUF customer, supplier or other external stakeholder can share concerns anonymously. However, KNAUF does encourage customers, suppliers or other external stakeholders to reveal the identity as it is more difficult and, in some cases, impossible, for us to carry out an investigation which is submitted anonymously.

7. RETENTION OF RECORD

Reports of violations or suspected violations will be kept confidential as far as possible - including for the retention of records, consistent with the need to conduct an adequate investigation. We erase business records in accordance with applicable law, to the extent needed for business purposes, or longer if required by law like tax law, works council agreements, regulatory, or other obligations.

8. DATA PRIVACY

The handling of a Speak-Up report may give rise to the processing of personal data. Our privacy notice is attached in Annex A.

Accepted and authorized by:

Date: 01.06.2023

		
Alexander Knäuper	Jörg Kampmeyer	Dr. Uwe Knotzer

9. ANNEX

Annex A- Privacy Notice

The purpose of this privacy notice is to explain how personal data is processed in KNAUF Speak-Up Line.

1. Contact details

The controller in the meaning of the General Data Protection Regulation (GDPR) is:

*Gebr. Knauf KG
Am Bahnhof 7
97346 Iphofen
Telephone: +49 (0) 9323 / 31-0
E-Mail: zentrale@knauf.com*

If you have any questions regarding Data Protection, please contact the Group Data Protection Officer:

*Group Data Protection Officer
Am Bahnhof 7
97346 Iphofen
Telephone: + 49 9323 / 31-0
E-Mail: data-protection@knauf.com*

2. Processing of personal data

It is possible that KNAUF employees, external staff or stakeholders may be identified, when submitting personal data.

The types of personal data that may be collected and processed, may include the following:

- the identity, function and contact details of the reporter.
- the identity, function and contact details of the person specified in the report.
- any other information communicated by the reporter.

3. Purposes of processing of personal data

KNAUF will only process personal data which are compatible with the purposes described below. KNAUF will take necessary measures to make sure that personal data is accurate and complete.

The purposes of processing of personal data are:

- to investigate suspected violations.
- to contact the reporter in case of non- anonymous reports.
- to take follow up measures to complete the investigation.
- to perform anonymous reports for KNAUF management.

4. Legal basis

KNAUF processes personal data on **legitimate interests** as the lawful basis. Especially, personal data of the suspect is processed due to a legitimate interest. Our legitimate interest is to investigate suspected violations.

In case of a non-anonymous report, personal data is processed with the **consent of the data subject**. The consent can be withdrawn at any time.

5. Data recipients

Personal data collected for the purposes mentioned above will be shared with our processor who administers the KNAUF Speak-Up Line on behalf of KNAUF:

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Atlanta, GA, USA (Co-Headquarters) 1200 Abernathy Rd NE, Building 600 Atlanta, GA 30328 United States +1 (844) 847-7154	London, England (Co-Headquarters) 82 St John St Farringdon London, EC 1M 4JN +44 (800) 011-9778	Munich, Germany Mühldorfstraße 8 81671 München Germany +049 (0) 89 262 013 995
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Furthermore, personal data will be shared with KNAUF Compliance (Gebr. Knauf KG) and other internal investigators.

We may also instruct third party experts, such as forensic experts, external lawyers or consultants for the purpose of conducting internal investigations in relation to (suspected) violation(s). Moreover, personal data collected for KNAUF Speak-Up purposes will only be disclosed to any other third party if KNAUF is under a duty to disclose or share your personal data in order to comply with any legal obligation or when necessary to report criminal offenses.

6. Cross border transfer

Data may be transferred to companies within the Knauf Group. Details on these companies can be found under the following link: <http://www.knauf.com/de/knauf-partnerunternehmen/adressbuch/index.html>.

To the extent that your personal data is transferred to one of the companies mentioned above, which are located in countries outside the European Union, appropriate safeguards in the form of EU standard contractual clauses will be concluded to protect your personal data. The legally compliant transfer of data as well as an appropriate group-wide level of data protection is ensured.

7. Data retention

Reports of violations or suspected violations will be kept confidential as far as possible - including for the retention of records, consistent with the need to conduct an adequate investigation. We erase business records in accordance with the applicable law, to the extent needed for business purposes, or longer if required by law like tax law, works council agreements, regulatory, or other obligations.

8. Rights of the Data Subjects

- Right to be informed (GDPR Articles 12 to 14): Data subjects have the right to be informed about the collection and use of their personal data.
- Right to access (GDPR Article 15): Data subjects have the right to view and request copies of their personal data.
- Right to rectification (GDPR Article 16): Data subjects have the right to request inaccurate or outdated personal information be updated or corrected.

- Right to be forgotten/Right to erasure (GDPR Article 17): Data subjects have the right to request their personal data be deleted. Note that this is not an absolute right and may be subject to exemptions based on certain laws.
- Right to data portability (GDPR Article 20): Data subjects have the right to ask for their data to be transferred to another controller or provided to them. The data must be provided in a machine-readable electronic format.
- Right to restrict processing (Article 18): Data subjects have the right to request the restriction or suppression of their personal data.
- Right to withdraw consent (GDPR Article 7): Data subjects have the right to withdraw previously given consent to process their personal data.
- Right to object (GDPR Article 21): Data subjects have the right to object to the processing of their personal data.
- Right to object to automated processing (GDPR Article 22)

You also have the right to lodge a complaint at the responsible Data Protection Authority responsible if you believe that applicable data protection laws have been violated by KNAUF in connection with this Speak-Up Policy.