



Walki Group
Whistleblowing reporting Channel
Guidelines and procedure

01.03.2022

Guidelines for the WB reporting channel and the reporting procedure

1. GENERAL

These guidelines on the reporting channel and reporting procedure describe how the electronic whistleblowing reporting channel (the "Reporting Channel") is used in Walki Group and how reports made by whistleblowers are handled in the channel. The Reporting Channel conforms with the EU Whistleblower protection directive (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019. The Reporting Channel is in use in Walki Holding Oy and its subsidiaries (hereinafter "Walki Group", see Appendix 1 for a complete list of companies).

We, Walki Group, are obliged to comply with the laws and other regulations that affect us and the group agreements established for the Reporting Channel. The Reporting Channel allows all Walki Group's employees and actors related to Walki Group's Code of Conduct (hereinafter the "Reporting Person") to report in confidence and, if they wish, anonymously, any activities they have detected that are contrary to applicable law or group rules.

The Reporting person does not need to have solid evidence of abuse before reporting the suspicion. However, the reports must be made honestly and in good faith. Misuse of the Reporting Channel, i.e. intentional reporting of harmful, misleading, or inappropriate information, is a crime that may lead to further action.

Employees are encouraged to primarily report perceived violations to their nearest supervisor or other responsible person in the organization. If the Reporting person needs protection against possible retaliation or wishes to report anonymously, he can report his suspicion via the electronic messaging channel.

2. WHEN SHOULD THE REPORT BE MADE?

If you notice or suspect abuse or violation, report it immediately. The Reporting Channel may be used for reporting certain violations of law specified in the Whistleblower Protection Directive and the national implementing legislation. For example, the subject matter may be a violation of data protection law or competition law. In addition to the statutory requirements, Walki Group makes the Reporting Channel available for reporting any suspected breaches of relevant legislation or Walki Group's Code of Conduct. The Code of Conduct is a set of internal rules accepted by the Supervisory Board of Walki Group, which is applicable to all the companies in Walki Group and the stakeholders thereof.

In the event of normal work-related disagreements or work safety issues (for the latter, a separate reporting channel is available), please contact your supervisor or other person responsible in our organization in the first place, unless there is a risk of retaliation or conflict of interest. If the supervisor or other person responsible within an organization considers that the matter should instead be reported through the Reporting Channel, they may urge the Reporting person to use the Reporting Channel, or report the matter themselves, if the Reporting person fails to do so.

Reporting in the Channel on suspected breaches or notification of concerns that occur in accordance with the rules and in good faith is without the risk of subsequent discrimination or other disadvantages. The use of the Reporting Channel also ensures that the investigation is properly conducted, that the identity of the whistleblower is protected, and that anonymous reporting is possible.

3. HOW SHOULD THE REPORT BE MADE?

If an employee detects an activity that does not comply with group rules or other policies, they may report confidentially and, if they so wish, anonymously through the whistleblowing service at the address: <https://walki.integrityline.com>.

The report is made through an external reporting channel. The report may be made in any of the following languages: Finnish, Swedish, English, German, Polish, Dutch, Spanish, French, Russian and Chinese. The channel is maintained by EQS (EQS Group AG), which is an impartial service provider, ensuring anonymous processing of reports. EQS or Walki Group will not be able to identify the source of the message unless you provide your contact details, which is optional.

In the channel, the Reporting person creates a password and receives a case ID. The Reporting person should save these for later use. By entering the case ID and password, the Reporting person can communicate through the system mailbox about additional information related to the alert and receive notifications about the alert from the alert handlers.

Before reporting, the Reporting person should assess whether the matter should be directly reported to the supervisor or other person responsible for the matter within an organization, or through the Reporting Channel. Where the Reporting Channel is used, the communication related to the matter will primarily take place via the Reporting Channel. Should the investigation lead to a need to obtain further information on the matter, other means of communication, e.g. face-to-face meetings, may be used.

4. REPORTING AND DECISION-MAKING PROCESS

All reports will be taken seriously and will be treated and examined in confidence by the persons assigned to this task. The process owner for Walki Group's Reporting Channel is the Group Compliance Officer.

Members of the Whistleblowing resolver are the members of CR Committee (Corporate Responsibility Committee) and a nominated member of the Supervisory Board.

4.1. Receipt of reports

It is important for Walki Group that the Reporting Channel as a system is credible and reliable from the Reporting person's point of view. To ensure credibility and avoid conflicts of interest, the receipt of electronic messages and their first processing on the EQS channel is carried out by a third party (KPMG Oy Ab).

Walki Group do not have access to the information provided through the EQS web platform and its processing is limited to KPMG-authorized investigation staff.

The Reporting person will be notified of receipt of the message within seven (7) days via the EQS channel communication application.

4.2. PROCESSING OF REPORTS

All messages received through the messaging channel will be treated in the same way, regardless of the reporting method used and the type of case to be reported. The reports are processed by KPMG's authorized investigation staff.

KPMG will review the reports made through the Reporting Channel and, if necessary, request additional information or clarification from the Reporting person via the EQS channel's communication application. KPMG will not see the notifier's personal information at any stage of the processing if they have wished to report anonymously. During the process, no attempt will be made to investigate the identity of the Reporting person. The channel can be accessed with any device with an internet connection and a net browser. To ensure complete anonymity, it is recommended that the connection to the EQS channel takes place via a computer/device, which is not tied to the company.

Following the investigation, KPMG forwards the report to the appropriate decision-making level within Walki Group to take further action. Usually, KPMG will forward the report to the Reporting Channel administrators of Walki Group, which will forward the report to the decision-making body. The team of administrators consists of process owner and Group HR specialist of Walki Group. However, the level of decision-making depends on the nature of the case and the persons involved in the report as described in the following section, and therefore KPMG may directly forward the report to a higher decision-making level. Persons involved or otherwise included in suspected wrongdoing are not allowed to process the reports and make any decisions related to them.

4.3. DECISION MAKING

The members of Walki Group's decision-making body, appointed by the Supervisory Board of Walki Group, are responsible for decisions on follow-up of messages received through the Reporting Channel. If the reported case concerns a member of the decision-making body, the person concerned by the report must refrain from taking any decision. If the report applies to all CR members of the decision-making body, the nominated Supervisory Board member of the decision-making body will resolve the matter or decide on further measures. The independence and freedom from conflicts of interest which might otherwise be perceived arising from involvement in the management of the Group's business, is further protected in Shareholders Agreement, where the majority shareholder is entitled to appoint and remove Resolution Body members. The majority shareholder has confirmed it is aware of such right and shall use this right at its discretion.

The members of the decision-making body are responsible for allocating responsibility for the necessary measures to the appropriate unit and monitoring the measures. The content of the alerts is not visible and no other person in Walki Group participates in the processing of the alerts. Generally, the personal data in the report will not be passed on for decision-making, but only in situations where the personal data significantly contributes to the investigation of the case.

The Reporting person will be informed of the measures taken for the report and the planned follow-up no later than three (3) months after receipt of the report. Follow-up measures may be classified as follows:

- 1) The case does not lead to further action as there is insufficient evidence or for any other reason, such as the fact that the report is clearly unfounded, completely lacks credibility or insurmountable difficulties in the investigation.
- 2) An internal investigation will be launched into the case.
- 3) An external investigation will be launched.
- 4) The case is referred to the authorities.

The internal Reporting Channel is the primary method of reporting for issues which an employee considers too sensitive to be addressed directly with his or her superiors. If the employee does not get a reasonably satisfactory explanation as to how the report has been dealt with within three (3) months from receiving the report receipt, or if he or she has valid reasons to believe that the entire Walki Group's decision-making body has a conflict of interest in the subject matter, the employee may then file a report to the competent authority's' public external whistleblower reporting channel (in Finland the Office of the Chancellor of Justice). It is not advisable to disclose matters intended to be dealt with in the Reporting Channel in any other way, media or form as such action could void the protection your employer grants to you, and could be a violation of your employment duties.

5. PROTECTION AND CONFIDENTIALITY OF THE REPORTING PERSON

The Reporting person is protected from countermeasures, if he or she has expressed his doubts in good faith. Prohibited countermeasures may include, for example, dismissal, sanction, or discriminatory treatment. If the Reporting person considers that he or she has experienced any such countermeasures because of the report, he or she can immediately file complaint in the Reporting Channel after which the service provider will forward the report to the appropriate level in the decision-making body.

The processing of personal data received through the Reporting Channel complies with the General Data Protection Regulation of the European Union, the Whistleblower Protection Directive, national law and Walki Group's rules and guidelines.

6. PROCESSING AND STORAGE OF DATA

Personal data collected through the Reporting Channel will only be processed for the purpose of reviewing the communication and discharging the employer's statutory duties in connection therewith.

Personal data included in the report will be deleted from the system to the extent it is evident that it is no longer needed for investigative and enforcement purposes or does not have a statutory basis for retention, and usually within three months (90 days) after the investigation has been concluded. The deletion of information will be marked, leaving an audit trail of the data processing in the system. Personal data that is considered to have a statutory basis for retention can be stored beyond the specified deadline of 90 days.

Personal data stored beyond 90 days as referred to above will be stored for six (6) years. Stored information will only be used for any legal proceedings, official investigations or preparation thereof. Access to the data is restricted and data protection is also secured by technical security measures. Stored information may be disclosed to the authority having jurisdiction over the subject matter.

The information is stored encrypted on the EQS channel server and EQS does not have access to the content of this information at any stage.

7. IMPLEMENTATION

Instructions on the Reporting Channel and reporting procedure are available on each organisation's intranet and Walki Group's publicly available website. Employees of Walki Group and actors related to Walki Code of Conduct can get acquainted with the instructions at www.walki.com. Appropriate information and instructions on the use of the Reporting Channel and how to make a report are given to Walki Group's employees, so that they are aware of their rights and obligations based on these instructions.

These guidelines will be updated as necessary and changes will be approved by the Supervisory Board of Walki Group under the Articles of Association of Walki Group Oy, as may be amended from time to time.

These guidelines for the Reporting Channel and the reporting procedure have been approved by the Supervisory Board of Walki Group and will enter into force on 01.03.2022.

APPENDIX 1

A Complete List of Participants- TBU

Appendix 1 - List of Participants, Walki WB Channel

Walki Group

Whistleblowing Channel Guidelines and reporting procedure

List of Walki Companies	
Company Name	Country
Walki Holding Oy	Finland
Walki Group Oy	Finland
Walki Oy	Finland
Walki GmbH	Germany
Walki Service GmbH	Germany
Walki Ltd	UK
Walki Packaging Paper (Changshu) Co. Ltd	China
Walki AB	Sweden
Walki SAS	France
Walki Pte, Ltd	Singapore
Walki Ekopak S.A	Poland
Walki Sp.z.o.o	Poland
Walki Holding B.V.	The Netherlands
Walki B.V.	The Netherlands
Walki Laminates India Private Ltd	India
Walki Plastiroll Oy	Finland
Walki Belcoat NV	Belgium
Plasbel Plasticos S.A.U	Spain
JGEI Investissements	France
Rollpack Europe	France
Rollpack	France