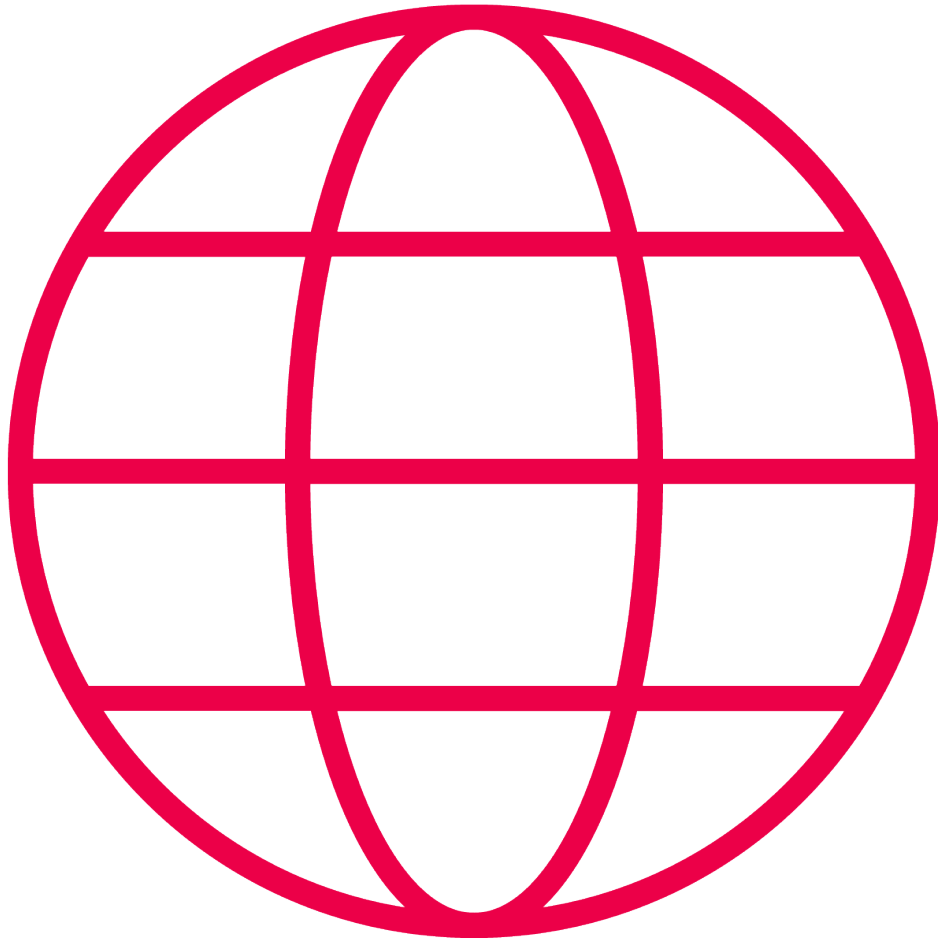


Everllence



Integrity & Compliance

Overview

Integrity & Compliance at Everllence

As a global enterprise that operates in many business areas, Everllence has a corporate responsibility to its customers, employees, investors, and the public. This corporate responsibility includes complying with laws everywhere and always, respecting ethical values and acting sustainably.

Integrity & Compliance are a fundamental part of the Everllence strategy and are practiced at all levels of the Group and by all employees – the Executive Board, management, and all other employees.

The Everllence Integrity & Compliance Program focuses on integrity as well as white collar crime, especially anticorruption and the prevention of money laundering and antitrust law.

The group-wide Integrity & Compliance Program is designed to

- prevent compliance violations (**prevention**),
- detect as early as possible compliance violations that may arise despite preventative measures (**detection**),
- and respond quickly and efficiently to any compliance violations (**response**).

Prevention

The aim of the Integrity & Compliance Organization is to further establish and promote awareness and understanding of responsible and honest conduct among all Everllence employees, suppliers and business partners.

In order to prevent compliance violations, the Integrity & Compliance Organization has implemented various measures:

Code of Conduct

The Everllence Code of Conduct applies to all Everllence employees – the Executive Board, management, and all other employees. The Code of Conduct is at the heart of Everllence's corporate culture and sets forth the most important compliance rules applicable and addresses the topics of integrity and culture. The Code of Conduct uses examples to lead and help the decision making in everyday business. Together, we take responsibility for our collaboration, our workplace, the environment, sustainability and society.

Code of Conduct for Suppliers and Business Partners

Everllence expects its suppliers and business partners and their employees to respect laws and behave responsibly and with integrity, everywhere and always. That is why Everllence has a Code of Conduct for Suppliers and Business Partners, which communicates the ethical standards that Everllence requires suppliers and business partners to uphold.

Communication

The Integrity & Compliance Organization continuously communicates across all levels of the organization. Integrity & Compliance topics are regularly featured in Everllence's company media, such as newsletters, employee magazines, and the Intranet. In addition, the Integrity & Compliance Organization informs and advises managers and other employees through trainings, the helpdesk service, and at internal conferences and meetings.

Compliance policies

Everllence has group-wide compliance policies, which establish requirements related to anticorruption, antitrust law, the prevention of money laundering and terrorism financing, and Business Partner Integrity. These policies contain binding rules for all employees throughout the Group.

Compliance training program

Everllence has a robust Integrity & Compliance training program which covers all operations and employees worldwide. Diverse training methodologies and formats are used, ranging from e-learning modules to classroom and videoconference trainings. Key content includes information about the Code of Conduct, the Everllence Integrity & Compliance Organization, compliance policies and guidelines, practical and realistic case studies and other relevant knowledge about anticorruption, antitrust law, and the prevention of money laundering and terrorism financing.

Exchange of experiences with experts

The Integrity & Compliance Organization participates in regular exchanges on integrity & compliance topics with experts from industry and academia. Through memberships in external compliance-related initiatives, Everllence supports and encourages Integrity & Compliance initiatives individually and in partnership with other companies.

Helpdesk

Everllence offers a Compliance Helpdesk service to all employees, which they can use to address their integrity & compliance related questions directly to Compliance Officers via phone or e-mail. The queries made to the Compliance Helpdesk provide the Integrity & Compliance Organization with an overview of the most common questions that arise in the business. The knowledge gained from these questions is used to identify new risks and trends and to identify preventative compliance measures.

Monitoring

To ensure the sustainability of the Integrity & Compliance Program, the Integrity & Compliance Organization continuously reviews the Program's effectiveness and efficiency, by tracking the implementation of measures and projects. The Integrity & Compliance Organization also analyses potential weaknesses, in order to strengthen the Integrity & Compliance Program.

Tone from the Top

The Executive Board of Everllence is aware of its responsibility for Integrity & Compliance and is committed to fulfilling this responsibility. Everllence's Executive Board and management consider Integrity & Compliance to be an integral part of the corporate strategy.

Detection

The occurrence of legal violations within the Everllence Group can lead to considerable risks for the Everllence Group and the affected employees. Therefore, Integrity & Compliance with the law have the highest priority within the Everllence Group. In order to guarantee these values, Everllence has created clear and transparent processes that ensure that violations of the law are identified, clarified and immediately remedied internally.

Compliance risk analysis

The Integrity & Compliance Organization carries out periodic group-wide compliance risk analysis. The risk analysis takes into account information such as the number and size of individual Group companies, the business model, the customer and sales structure, country risk, and the structure of competition in the local market. In addition, the implementation of compliance measures and controls in the reviewed companies are audited internally.

Mergers and acquisitions (M&A)

To identify, prevent, and mitigate compliance risks during acquisition and divestment transactions, the Integrity & Compliance Organization is engaged in Everllence's M&A projects. The Integrity & Compliance Organization undertakes compliance due diligence assessments on concerned entities, which are intended to detect any compliance risks that may arise.

Whistleblower system

Everllence fosters the Speak Up culture and offers a secure whistleblower system for providing information on potential compliance violations, which is accessible to all, employees, customers, suppliers and other business partners. This allows anonymous, safe, and confidential sharing of such information at any time and from anywhere in the world. Tip-offs are forwarded to an independent unit for investigation. All whistleblowers who act in good faith are protected against discrimination and retaliation. You can find more information about the whistleblowing system here: [Whistleblower-System \(everllence.com\)](https://www.everllence.com/Whistleblower-System)

Response and resolute accountability

Everllence has zero tolerance for compliance breaches. The right response to compliance violations and misconduct is essential for minimizing the negative impact of any breach, by holding those responsible accountable, and ensuring that our commitment in doing business with integrity remains firm.

Investigations by authorities

Everllence is also committed to cooperating closely with the responsible authorities.

Everllence has a guideline for employees, which emphasizes the importance of openness, transparency, and cooperation with authorities' searches.

Continuous improvement of the Integrity & Compliance Program

The Integrity & Compliance Organization continuously develops and improves the Integrity & Compliance Program.

Contact

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