

## REPORTING WRONGDOING POLICY

### PURPOSE:

Archimica is committed to maintaining high standards of business conduct in our dealings with customers, suppliers, fellow employees, civic and community leaders, and others. In line with this commitment, this policy aims to provide an avenue for employees to raise concerns regarding wrongdoing and to foster a workplace conducive to open communication regarding the Company's business practices.

This policy is consistent with, and made part of the Archimica's Code of Business Conduct and Corporate Governance Policies. Employees are strongly encouraged to discuss with supervisors, managers or other appropriate personnel, when in doubt, about the best and ethical course of action in a particular situation.

### POLICY / PROCEDURE FOR COMMUNICATING ALLEGATIONS:

This procedure is intended to be used for serious and sensitive issues. Serious concerns relating to wrongdoing should be reported in one of the following ways:

1. Directly to Archimica's Global General Counsel via email to [legal@archimica.com](mailto:legal@archimica.com) or via facsimile to +31 10.799.4214 or via phone at the number listed in Archimica's telephone directory for "legal counsel").
2. Directly to the employee's Site Human Resources Director. Employment-related concerns should continue to be reported through normal human resource channels.

Archimica encourages employees to attach their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. It is Archimica's policy to encourage our employees to report concerns as soon as possible after discovery so that timely action may be taken.

All reports made under this policy will be taken seriously. For instance, where appropriate, an independent investigation of the complaint may be undertaken. The action taken will depend on the nature and gravity of the concern. Archimica has designated its Global General Counsel to coordinate any necessary Company action in response to a report. Where warranted, Archimica's Global General Counsel will report the matter to Archimica's Board of Directors. When practicable, complainants will be given the opportunity to receive follow-up on their concern within two weeks from the date of the report, including: acknowledgment that the concern was received; indication of how the matter will be dealt with; an estimate of the time that it will take for a final response; whether initial inquiries have been made; and whether further investigations will follow, and if not, why not.

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant. Subject to any applicable legal constraints or special circumstances, the complainant will receive information about the outcome of any investigations.

**SAFEGUARDS:**

**Discrimination, Retaliation, Harassment or Victimization.** Archimica strictly prohibits any discrimination, retaliation or harassment against any person who makes a report in good faith or participates in any investigation of a report under this policy. Employees who believe they have been subjected to any discrimination, retaliation or harassment for having submitted a complaint or for participating in an investigation relating to such a complaint should immediately report the concern to Archimica's General Counsel (at [legal@archimica.com](mailto:legal@archimica.com) or via facsimile to +31 10.799.4214) and/or to his or her supervisor. Any complaint of such discrimination, retaliation or harassment will be promptly and thoroughly investigated and, if substantiated, appropriate disciplinary action will be taken, up to and including termination. Please note however, that employees who knowingly file misleading or false reports, or without a good faith or a reasonable belief as to truth or accuracy, will not be protected by this policy and may be subject to discipline, including termination of employment.

**CONFIDENTIALITY:**

Reports may be submitted anonymously or the person submitting the Report may request to remain anonymous. Should a person desire to remain anonymous, that desire will be respected. Discussions and documentation regarding reports will be kept in strict confidence to the extent appropriate or permitted by policy or law. Should the person submitting the Report identify himself or herself, the recipient of the Report will communicate to the employee the steps to be taken to address the Report and the results of any Company actions initiated. This confidential report process may be used either to submit a new Report, or to address an employee's previous Report, which such employee does not feel was adequately resolved.

**DEFINITIONS:**

For purposes of this policy:

(1) **Good Faith.** Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

(2) **Wrongdoing.** Examples of wrongdoing include, but are not limited to, fraud (including financial fraud and accounting fraud and document falsification), violation of applicable laws and regulations, violations of Archimica policies, unethical behavior or practices in violation of Archimica's Business Conduct Policy, endangerment to public health or safety and negligence of duty.

On behalf of the Board of Directors



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James Harrison  
CEO