

Whistleblowing Policy

I. Introduction

Archroma Management LLC and its affiliated companies ("**Archroma**") are committed to integrity and an open culture where everybody feels secure in seeking advice or raising concerns, and has confidence that reports are handled in a professional and transparent way.

To help in its ability to provide advice and enable employees to report concerns or misconduct, Archroma has established a system of compliance reporting channels, as set out in Section III. below ("**Reporting Channels**"). The Reporting Channels cover all relevant Archroma business operations worldwide.

Employees must not use the Reporting Channels to report events presenting an immediate threat to life, health or property. As set out below, reports submitted through the Reporting Channels may not receive an immediate response. If emergency assistance is required, employees must contact the local police, fire department or ambulance service.

This Whistleblowing Policy ("**WBS Policy**") applies to all directors, officers, and employees of Archroma (collectively, "**Employees**"). It is a comprehensive resource guide for Employees who have questions or feel they should raise a concern or report suspected misconduct. In any case where applicable local law conflicts with a provision of this WBS Policy, the local law shall prevail and preempt this WBS Policy. This WBS Policy is intended for internal use only.

II. When should Employees speak up?

Every Employee should feel comfortable to speak up, ask questions when unsure, and report in good faith concerns or misconduct. Archroma strongly encourages Employees to report violations of the Archroma Code of Conduct, Archroma policies or directives, or any other breaches of law.

When reporting a concern or misconduct, Employees must be aware that the information provided or the allegations made could result in investigations and decisions that affect other Employees or third parties. Accordingly, only information that is fact-based, reasonably substantiated and accurate to the

best of the Employee's knowledge shall be reported. Employees abusing the Archroma reporting resources by knowingly making false reports to denunciate other Employees will face disciplinary consequences.

III. Reporting Channels

If Employees become aware of a situation that they know or suspect violates the Archroma Code of Conduct or the law, they are strongly encouraged to report it by using any of the channels set out below:

- Bringing the violation or concern to the attention of their local supervisor, or any member of local management, as appropriate;
- Informing a local Compliance Delegate, Legal Counsel or Human Resources (HR) Manager (where appointed for their relevant country or region);
- Making a direct report to the following:

Archroma Management LLC
Attn: Group Compliance
Neuhofstrasse 11
CH-4153 Reinach, Switzerland
Tel: +34 934 798 391
compliance@archroma.com

When making a report, Employees should describe the type of concern and provide as many relevant facts as possible, including dates, persons, details and explanations in relation to the reported misconduct that could assist the investigation specialists in their fact-finding exercise. Reports which cannot be substantiated or followed-up will not justify further investigation or review.

IV. Obtaining guidance and asking questions

All questions relating to the Archroma Code of Conduct, the laws and regulations applicable to Archroma's business operations, Archroma directives and policies or a specific situation can be addressed to the Reporting Channels listed in Section III. for making reports.

V. Restrictions on reporting outside of the Reporting channels

Employees are bound to strict confidentiality and loyalty under their employment contract with Archroma. Subject to the following paragraph, Employees may not disclose any internal information, including information about suspected improper activities, to public authorities or third parties outside the Archroma Reporting Channels specified in Section III.

Exceptions apply only if and to the extent applicable local law (i) prohibits such limitations on Employees' disclosure rights to public authorities, or (ii) protects, or even demands, reports to public authorities without bringing the activity to the attention of the responsible supervisor or another

designated internal function beforehand and thereby affording the employer a reasonable opportunity to correct the improper activity.

VI. Protection of Whistleblowers

1. Confidentiality

Archroma will take all reasonable steps to ensure confidentiality throughout the whistleblowing process, so Employees raising concerns should not fear that their identity or related data will be improperly disclosed or abused.

If Employees disclose their name when making a report, their identity may only be disclosed on a strictly need-to-know basis to selected people involved in any investigation or subsequent judicial or administrative proceedings instigated as a result of the report. Access and processing of data is restricted to members of the Group Legal & Compliance Department in Switzerland and to those internal and external resources who are assigned by Group Legal & Compliance in the investigation or remediation processes.

2. Anonymous Reporting

While anonymous reporting is permissible in most countries Archroma strongly encourages all Employees to disclose their identity and to state their name and a phone number or email address. Sharing ones identity when making a report will help Archroma conduct the most thorough investigation possible, because it may be more difficult to thoroughly investigate anonymous reports.

If Employees are uncomfortable identifying themselves, they may report anonymously in most jurisdictions. Regardless of how Employees choose to report, all reports of actual or suspected misconduct will be taken seriously and addressed promptly.

3. Protection from Retaliation

Archroma strictly prohibits acts of retaliation against Employees who have, in good faith, reported a concern or possible misconduct or who are participating in a compliance investigation. In this context "good faith" means that the reporting Employees (i) provide all of the information they have, (ii) reasonably believe that the allegations are substantially true, and (iii) are not acting for personal gain. It is not relevant whether, following an investigation, the reported concern or misconduct is found to be valid and substantiated or not.

Retaliation is prohibited in any way that might have a direct or indirect negative effect on the physical integrity, employment, earnings possibilities, bonus payments, career options or other work-related interests of the reporting Employees. Consequently, any form of disadvantaging or discrimination, as well as the threat thereof, is not permitted.

Employees who believe that they have been confronted with imminent or threatened retaliation are asked to immediately consult any of the resources set out in Section III. above. Archroma will take all measures that are required to protect the interests of the affected whistleblower. In the event of alleged retaliation, a separate investigation regarding the alleged retaliation will be initiated. Individuals who take action against an Employee for making a report or participating in an

investigation will be subject to disciplinary action, up to and including termination of the employment contract.

VII. Data Security and Data Privacy

All data submitted via the Reporting Channels ("**Data**") is (as the case may be) controlled by Archroma Management LLC, Neuhofstrasse 11, CH-4153 Reinach, and/or by the respective Archroma Group Company to which the report has been submitted ("**Data Controller**").

All reports made in accordance with this WBS Policy, as well as supporting documentation and investigation results will be processed and stored on Archroma IT systems.

The Archroma IT systems are protected by state-of-the-art IT security principles. Archroma and all service providers involved in the data processing will take all reasonable technical and organizational precautions to preserve the security of the data and protect it from accidental or unlawful destruction or accidental loss and unauthorized disclosure or access.

Based on applicable data privacy laws, upon request, data subjects will be provided access to Data registered on him or her in order to verify data accuracy and rectify potentially inaccurate, incomplete or outdated data. All such requests will have to be directed to the Data Controller set out above. The Data Controller may, at its own discretion but subject to applicable data privacy laws, restrict the mentioned rights in order to protect the investigation process or other data subjects involved.

Based on applicable data retention and data privacy laws, the Data Controller will keep the Data as long as required for any required investigation, remediation processes and, if applicable, to conclude any resulting formal dispute resolution process. Personal data relating to reports found to be unsubstantiated will be deleted or anonymized as soon as possible. Where legally permissible, the Data Controller may choose to anonymize Data once the applicable retention period has lapsed.

VIII. Investigation and Sanctioning Process

Regardless of how Employees choose to report, all reports of actual or suspected misconduct will be taken seriously and addressed promptly. The appropriate investigation personnel will carefully investigate the reports and the relevant Archroma employing company will take appropriate and necessary action.

All reports are read and processed by a team of Archroma compliance and investigation experts. They will ensure required steps for investigating and resolving the situation are taken. Depending on the complexity and severity of the report the case will be handled either at Group, regional or local level. Reports not involving violations of the Archroma Code of Conduct may be investigated and resolved by the local Human Resources department.

A compliance investigation may take several months, especially in complex cases. Furthermore, for data privacy and other reasons, it may not be possible to communicate with the whistleblower regarding the investigation process or disclose the investigation outcome.

Concurrently with the standards governing the fact-finding exercise, Archroma has also implemented transparent and professional sanctioning and remediation processes. Any disciplinary action

addressing violations of the Archroma Code of Conduct will be resolved by high-ranking representatives of the management, as well as the Heads of the respective Legal/Compliance and Human Resources Functions.

The responsible sanctioning body applies the same procedures and tolerance levels for the same or comparable violations, irrespective of rank, merit or location of the responsible person. The same type of offense should lead to comparable disciplinary action, irrespective of the employee's status within Archroma. Sanctions will be categorized in a matrix according to the nature, significance and impact of the violation. This helps to apply consistent and transparent corrective and remedial action throughout the Archroma organization.

IX. History

Revision	Date	Change	Author
1	February 2015	New document Approved by Alexander Wessels - CEO	Hans Lourens
2	06.06.18	Contact information – section III	Ana Pérez