

Frequently Asked Questions

ABOUT kpEthicsHotline

What is the kpEthicsHotline?

kpEthicsHotline is maintained through an independent company, EthicsPoint, that provides secure, confidential telephone and web-based systems for use by those that wish to report a concern they may have with regard to compliance of the Klöckner Pentaplast Code of Business Conduct and Ethics or related policies, or the laws and regulations applicable to where Klöckner Pentaplast engages in business.

Why do we need EthicsPoint?

Klöckner Pentaplast is committed to a culture of openness and honesty, where a person who is aware of potential misconduct or unethical behaviour is encouraged to report such matters in good faith and without fear of retaliation.

REPORTING A CONCERN

How do I make a report?

With kpEthicsHotline, you have the ability to file a confidential report via country specific telephone numbers or via the Internet through the kpEthicsHotline website. You may remain anonymous if you choose to do so. Information for both methods may be found on the homepage for kpEthicsHotline

What if this is an emergency?

Concerns with an immediate threat of physical harm or damage to property should not be reported to kpEthicsHotline. If you require immediate assistance, please contact your local emergency services.

What types of situations should I report?

The kpEthicsHotline is designed for employees, suppliers, customers and other stakeholders to report any concern with regards to compliance of the Klöckner Pentaplast Code of Business Conduct and Ethics or related policies, or the laws and regulations applicable to where Klöckner Pentaplast engages in business.

Some examples may include, but are not limited to:

- Inaccurate or falsified books, records or other accounting or audit matters
- Conflicts of interest
- Anti-Trust, Competition or Fair Trade Practice violations
- Discrimination or Harassment
- Misuse of company assets, theft or embezzlement
- Workplace violence
- Unsafe working conditions
- Environmental concerns
- Improper dealings with customers or suppliers

Should I report my concern to my manager, Human Resource manager or through kpEthicsHotline?

When you observe behaviour that you believe violates our Code of Business Conduct & Ethics or other related policies, or the law, you are expected to report it. You can bring any concern to your manager or your Human Resource representative. However, we recognize that there may be circumstances when you are not comfortable with reporting the issue in this manner, or if you believe your concern has not been satisfactorily addressed, or you wish to remain anonymous, then kpEthicsHotline is a resource for you.

Some issues are better discussed with your manager or Human Resource manager and not through kpEthicsHotline. Ask yourself if the issue is related to a violation of compliance or ethical behaviour. Your manager or Human Resource representative is better able to help you if your issue is related to compensation or benefits which are not violating any laws or ethical behaviour.

I'VE FILED A REPORT, NOW WHAT?

Where do these reports go? Who has access to them?

Reports entered directly through kpEthicsHotline, whether via telephone or web are stored on a secure server. EthicsPoint does not trace phone calls or use Caller Identification, nor is there any connection logs maintained containing Internet Protocol (IP) addresses. You can be assured of the confidentiality of your report, and should you remain anonymous, there is no way to identify a reporter.

A small dedicated team will receive notice when a concern is received. An appropriate investigation will commence, using internal or external resources with expertise in conducting investigations. Report recipients handle these reports with the utmost confidence.

What happens after I file a report?

When you file a report, you will receive a unique user name and password. You can return to the kpEthiscHotline system again either by the Internet or telephone to access the original report or to provide additional information. If additional information is necessary by the investigator, a request for information may be made as a follow up to the original report. There is also the ability to enter into an anonymous dialogue between the dedicated team investigating the report and yourself. It is suggested you check periodically for any communications from the investigation team.

What if I lose my report key or password?

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to another report supplied earlier.

What if my boss or other managers are involved in a violation? Will they get the report?

The system is designed so that implicated parties are not notified or granted access to reports in which they have been named.