



Policy

Whistleblower Policy

Number: LGL-10

Department: Legal

Last Updated: 2025/06/25

Regions: Global

Plants: N/A

Scope: This policy identifies the procedures for the reporting and treatment of complaints concerning activities and business conduct damaging to the business.

Owner: Whalen, Chad, Chief Legal Officer & Corporate Secretary

Approvers: Whalen, Chad, Chief Legal Officer & Corporate Secretary

Review Frequency: 1 year

Changes From Previous Version

Updated EthicsPoint phone numbers

I. PURPOSE

This policy aims to discourage illegal activity and business conduct that damages Calgon Carbon Corporation and its subsidiaries' (including Chemviron) name, reputation, business interests and relationships with its various stakeholders and the community at large. This policy provides an avenue for all current or former employees, contractors, and external consultants ("**Reporting individuals**") to raise concerns regarding actual or suspected improper conduct, noncompliance with laws, regulations, or other corporate policies, and improper or questionable financial and accounting matters. It also provides reassurance that Reporting individuals will be protected from reprisals or retaliation for raising legitimate concerns in good faith.

In order to facilitate the reporting of such employee complaints, Calgon Carbon Corporation (the "**Company**") has established the following procedures for the receipt, retention, investigation, and treatment of complaints.

II. SCOPE

These procedures apply to concerns relating to non-compliance with applicable laws and regulations or behavior that is contrary to the Company's corporate statements, compliance handbook, code of ethical business conduct, or other policies and procedures. This includes, without limitation, the following matters:

- employee working conditions effecting safety;
- fraud;
- conflicts of interest;
- deliberate error, omission or misstatement the preparation, evaluation, review or audit of any financial records of the Company;
- weaknesses, deficiencies in or noncompliance with the Company's internal accounting controls;
- deviation from full and fair reporting of the Company's financial condition;
- workplace harassment or bullying;
- bribery or corruption;
- anticompetitive actions that violate applicable antitrust laws;
- environmental compliance;
- product quality;
- consumer protection;
- security of networks and information systems;
- failure to protect privacy and personal data;
- failure to protect confidential information of the Company; and
- any other crime, offence, violation or attempt to conceal a violation.

III. POLICY

A Reporting Responsibility

It is the responsibility of all employees, officers, and directors of the Company and its subsidiaries to report in good faith any suspected illegal or improper activities as contemplated above.

B Receipt of Employee Complaints

Reporting individuals are first encouraged to raise concerns with their direct supervisor, plant manager, or any member of senior management. The Company encourages anyone raising concerns to identify themselves when making a report as this greatly facilitates that investigative process.

To the extent conditions exist making direct reporting to a supervisor or senior manager in any way inappropriate or uncomfortable, Reporting individuals may (i) report their concerns directly to the Chief Legal Officer or (ii) utilize the Company's EthicsPoint Hotline as described below:

Chad Whalen
Chief Legal Officer
Calgon Carbon Corporation
3000 GSK Drive
Moon Township, PA 15108
+1-412-787-6786
chad.whelen@kuraray.com

OR

<http://calgoncarbon.ethicspoint.com>



Ethics and Compliance Hotline

The EthicsPoint Hotline system can also be accessed via toll-free telephone in the following countries:

Belgium	0800 27 179
Brazil	0212 038 0840
China	400 120 0349
Denmark.....	80 83 07 98
France	0801 13 00 30
Germany	0800 181 4749
Hungary.....	06 80 080 933
India	022 5016 9905
Italy.....	800 932 497
Japan	0120 996 557
Mexico.....	800 872 1785
Netherlands.....	0800 024 9989
Singapore.....	800 492 2144
Spain	900 751 325
Sweden	020 12 77 52
Taiwan.....	00801 49 2136
United Kingdom.....	0808 196 7437
United States.....	1-877-315-9930

In addition to the EthicsPoint Hotline, reporting individuals may raise concerns orally and, at their request, during a videoconference or in-person meeting organized no later than 20 business days after receipt of such a request.

C Scope of Matters Covered

The procedures described in this policy apply to matters contemplated herein and are available to all Reporting individuals. Please note, however, that use of the EthicsPoint hotline cannot supersede disputes involving union employees covered by collective bargaining agreements. In

those situations, the applicable grievance procedure shall be the complaint mechanism required under the relevant collective bargaining agreement and under the National Labor Relations Act (in the U.S.).

D Treatment of Complaints

Upon receipt of a complaint, the Company will acknowledge receipt within 7 days, determine the admissibility and the nature of the complaint, and further investigate meritorious matters using internal and/or external legal, human resources, audit, or finance and accounting resources depending on the matter. Investigations will be conducted promptly, taking into account the nature and complexity of the allegations contained in the complaint, in any case the Reporting individual will receive feedback within a maximum of three months after acknowledgment of receipt. The Reporting Individual will be informed of the closure of the investigation.

If the results of the investigation warrant, prompt and appropriate corrective action will be taken by the Company. Once a matter has been closed, the Company will inform involved parties that the investigation has been completed and, to the extent reasonable, the general outcome while balancing the confidentiality and legal considerations unique to each investigated matter.

E Confidentiality

As discussed in Section (III)(B) above, anonymous reporting is not encouraged. However, the EthicsPoint Hotline provides a mechanism to raise complaints anonymously. The Company has no ability to identify Reporting individuals using the EthicsPoint hotline unless they voluntarily choose to identify themselves.

During the course of investigations, the Company will make its best efforts to keep the identity of the Reporting Individual, the reported facts and the identity of the persons covered by the report confidential. The identity of the Reporting Individual will not be disclosed beyond the authorized staff members without the consent of the Reporting Individual, unless the Company is required to do so by law or court order or deems it in the best interests of the Company to do so in order to conduct a proper investigation.

F Reporting and Retention of Complaints and Investigations

The Legal Department will maintain a log of all complaints reported through the EthicsPoint hotline and will tracking their investigation and resolution. Information related to such complaints will be maintained in accordance with the Company's document retention policy.

IV. NO RETALIATION

No one who reports a good-faith complaint as contemplated by this policy or who cooperates in the investigation of any such complaint shall suffer harassment, retaliation, or adverse employment consequences. Any such retaliation should be reported immediately consistent with the procedures detailed in the policy.

Anyone within Calgon Carbon Corporation who retaliates against another individual for reporting good-faith complaints or for cooperating with an investigation thereof is subject to discipline up to an including termination of employment.