



Policy

Whistleblower Policy

Number: LGL-10

Department: Legal

Last Updated: 03/15/2023

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 in response to EU directive and revised the scope to Global

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:

United States	1-877-315-9930
Belgium	0800-77004
Brazil	0800-8911667
Canada	1-877-315-9930
China (<i>Southern</i>)	10-800-120-1239
China (<i>Northern</i>)	10-800-712-1239
Denmark	80-882809
Finland	0800-1-14945
France	0800-91-0173
Germany	0800-1016582
Italy	800-791563
Japan	00531-121520
Mexico	001-800-840-7907
Singapore	800-1204201
Sweden	020-79-8729
Taiwan	00801-13-7956
Thailand	001-800-12-0665204
United Kingdom	0800-032-8483

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 to the extent reasonable 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.

WHISTLEBLOWER PRIVACY POLICY

This Whistleblower Privacy Policy is an appendix to the Whistleblower Policy and governs the collection, storage and use of personal data by us, Calgon Carbon Corporation and its subsidiaries' (including Chemviron), regarding the following individuals:

- current or former employees, contractors and external consultants that raise concerns regarding actual or suspected improper conduct, noncompliance with laws, regulations, or other corporate policies, and improper or questionable financial and accounting matters ("**Reporting individuals**"),
- the people whose personal data are reported in a report ("**Report**") ("**Persons Concerned**").

1. Data Controller

Calgon Carbon Corporation having its registered offices at 3000 GSK Drive, Moon Township, PA 15108, jointly with its subsidiaries' (herein after "**we**" or the "**data controller**").

2. The personal data we collect about you and the purposes for which we collect it:

Below you will find an overview of (2.1.) the categories of personal data that we (or third party data processors acting on our behalf) may collect, (2.2.) the purposes for which this data would be collected and the legal basis for processing.

2.1 Categories of personal data

We collect and process personal data relating to the Reporting individual, the Person Concerned and/or any person involved or connected to relevant circumstances described in the Report sent through Calgon Carbon Corporation's EthicsPoint Hotline or by any other means specified in the Whistleblower Policy. The personal data collected and processed:

Categories of personal data	Personal data
Information related to the Reporting individual	Name, contact details any other information related to the Reporting individual such as but not limited to name, job title, department, financial information (Reports can also be made anonymously)
Information contained in the Report	For example on the Persons Concerned and their contact details, a description of the breach or misconduct, time and place, and other information that the Reporting individual considers meaningful;
Supplementary information	Supplementary information pertaining to the reported incident or relevant parties received or collected during an internal investigation;
Information related to potential witnesses	Names and contact details of potential witnesses or other persons involved in the case;
Information related to the processing of the Report	Information on the processing of the Report and the communication regarding the case,

	and the stage reached in the processing of the Report
Special categories of personal data	In some cases, where necessary, also personal data belonging to special categories pursuant to the GDPR, such as health data.

2.2 Purposes and legal basis under the GDPR

We will collect, store and use your personal data for the following purposes and based on the following legal basis:

Purpose	Legal basis
Comply with our statutory obligations, in particular in accordance with the EU Whistleblower Directive and any other applicable national laws relating to whistleblowing	Legal obligation – article 6.1.(c) GDPR
Identify, investigate and prevent potential abuses	Legal obligation – article 6.1.(c) GDPR
Comply with our corporate statements, compliance handbook, code of ethical business conduct, or other policies and procedures	Legitimate interest – article 6.1.(f) GDPR
To establish, exercise or defend legal claims whether in court proceedings or in administrative or out-of-court procedures	Legitimate interest – article 6.1.(f) GDPR

3. How we share your personal data and who we share it with

Your personal data may be shared with and disclosed to third parties, such as:

- (i). External providers of reporting channels;
- (ii). IT service providers;
- (iii). Where necessary, Calgon Carbon Corporation subsidiaries (including Chemviron) and Kuraray Co., Ltd.;
- (iv). Where requested, the competent courts;
- (v). Where requested, law enforcement agencies (including the police);
- (vi). Where requested, public administrations and regulatory authorities.

In any case, the identity of the Reporting individual and any information from which the identity of Reporting individual may be directly or indirectly deduced will not be disclosed to anyone beyond authorised staff competent to receive or follow up on Reports, without the Reporting individual his/her

explicit consent or, where this is not requested, in accordance with the limits and the appropriate safeguards under any applicable law.

4. How long do we keep your personal data?

Personal data will be stored in compliance with the applicable laws, and in any case for a period of time not exceeding what is necessary for us to achieve the purposes for which they are processed.

Personal data which are manifestly not relevant for the handling of a specific Report should not be collected and, if accidentally collected, will be deleted without undue delay.

The criteria for determining the data retention period take into account the lawful processing period and applicable laws (for example, managing the investigation, concluding the activity of defining the whistleblowing, adopting the relevant measures, and complying with relevant tax or anti-money laundering laws).

The personal data may be stored for a longer period than the one originally planned, in the event of any disputes or requests by the relevant authorities or courts.

5. International transfers

Some of your personal data may be made accessible worldwide in connection with the abovementioned purposes. For example, your personal data may be used and/or accessed by staff operating outside the European Economic Area, working for us, our subsidiaries or third party data processors. Further details on to whom your personal information may be disclosed are set out in section 3.

If we provide any personal data about you to any such non-EEA member of our group of third party data processor, we will take appropriate measures to ensure that the recipient protects your personal data adequately in accordance with this privacy policy. These measures may include the following:

- (a) ensure that there is an adequacy decision by the European Commission in case of transfers out of the EEA which means that the recipient country is deemed to provide adequate protection for such personal data; or
- (b) enter into the standard contractual clauses as issued by the European Commission. These standard contractual clauses include certain safeguards to protect the personal data.

6. Security

We take appropriate technical and organisational measures to safeguard the personal data that you provide to us against unauthorized or unlawful processing and against accidental destruction, loss or damage, including through use of appropriate organisational and technical measures, such as physical access controls to premises, staff training, locking files away, ISO accreditation, encryption, passwords for systems access and anti-virus software.

7. Your rights

You have the following rights as a data subject:

- a) the right to access to personal data that we hold about you;
- b) the right to ask us to update or correct any out-of-date or incorrect personal data that we hold about you;
- c) where the processing is based on your consent, the right to withdraw consent at any given time, without affecting the lawfulness of processing based on consent before its withdrawal;

- d) the right to erasure where the conditions of article 17 of the GDPR have been met;
- e) the right to restriction of processing where the conditions of article 18 of the GDPR have been met;
- f) the right to data portability insofar the conditions of article 20 GDPR apply to you;
- g) the right to object to processing of personal data concerning you, insofar the conditions under article 21 GDPR have been met.

You can exercise these rights at any given time by emailing us at dataprotection.ccc@kuraray.com.

We may request further information before processing requests if it needs to verify your identity.

You also have the right to lodge a complaint with a supervisory data protection authority. The contact details of the data protection authorities can be found at: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

8. Contact

If you have any question about this privacy policy and/or how we collect, store and use your personal data, you can email us at dataprotection.ccc@kuraray.com.

You can also write to us at:

Attn: Data Protection, c/o Legal Department
Calgon Carbon Corporation
3000 GSK Drive
Moon Township, PA 15108
United States of America

While email and mail are preferred, you may also contact us toll free at 800-4CARBON (800-422-7266).

In your communications, please be clear that you are trying to contact Calgon Carbon Corporation about a data protection concern.