

Whistleblower Protection Policy			
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1. What is the purpose of this policy?

This policy provides information about Univar Solutions' ("Univar" or "Company") whistleblower protection framework, reporting channels, the investigation process and the different roles and responsibilities within that process.

Violation of law, our Code of Conduct or our policies negatively affects the Company's integrity and reputation, and could have serious legal, financial or other implications. The Company wants everyone to understand the importance and shared responsibility of reporting concerns, as well as the protections that exist for those who report a concern in good faith.

2. Why do we need this policy?

There are at least three reasons for this policy, as follows:

- The Company wants people to know about the different channels that can be used to report suspected wrongful activity. Depending on the circumstances, a particular reporting channel can be uncomfortable or inappropriate. For that reason, the Company maintains and supports multiple different reporting channels.
- Fear of retaliation is a top reason why employees do not report suspected wrongful activity. The Company wants to ensure that whistleblowers who report a concern in good faith are protected from any retaliation.
- It is important to the Company to create, maintain, and preserve a company culture rooted in ethical business practices and high integrity. Illegal actions or violations of the Company's Code of Conduct threaten this objective. But in order for the Company to address wrongful actions, it must know about them. Often, this knowledge comes from whistleblowers.

3. Who is covered by this policy?

This policy applies globally and to everyone working for or on behalf of the Company. This means all employees, directors, officers, agents, contractors, interns, and consultants share the responsibility of reporting a concern if there is knowledge or suspicion of wrongful activity.

A former employee or an outside third-party such as a vendor or customer can also use the hotline to report a concern and the investigation will be conducted in the same manner.

Protection from retaliation extends to the reporter as well as others who contribute to an investigation by providing truthful, supporting information.

Owner Name: Chief Risk Officer	Review Period: Annual	Next Review Date: 1/1/2022
Owner Signature		

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In case of a conflict between this policy and any local laws or regulations, the local laws and regulations will prevail.

4. Who or what is a Whistleblower?

A whistleblower, or reporter, is someone (usually an employee or someone affiliated with the Company) who reports in good faith any wrongful activity as described in this policy through any reporting channel.

A whistleblower also has the option to report suspected wrongful activity to an appropriate governmental or regulatory agency. If this path is chosen, the Company requests that the employee advise management, anyone in the Legal/Compliance Team, or Human Resources, but is not required to do so.

5. What should be reported?

This policy is designed to enable anyone who is covered by the policy to report in good faith any perceived or suspected wrongful activity, including but not limited to the following:

- a. Failure to comply with applicable laws or regulations
- b. Violation of the Company's Code of Conduct or policies
- c. Dishonest, fraudulent, inappropriate, negligent or unethical behavior
- d. Endangerment of the health and safety of any person
- e. Harassment, bullying or any other forms of discrimination in the workplace
- f. Deliberate concealment of any of the above

To the greatest extent possible, reporters should retain all documents or information that could be relevant to an investigation of the matter.

6. What are the key principles of this policy?

This policy is structured around 4 Key Principles:

a. Confidentiality

Everyone involved with the intake and investigation of a report are obligated to treat the report as confidential. Through all stages of the investigation process a reporter's identity is protected and will not be revealed without explicit prior consent.

b. Good Faith Reporting

Anyone who makes a report believing it is true will be protected under this policy, regardless of whether the report is substantiated or not. However, an employee who intentionally files a false report will be subject to discipline up to and including termination of employment.

c. Non-Retaliation

Those who make a report in good faith are protected from retaliation, or negative impact, as a result of making the report. Retaliation can be any adverse action such as discrimination, demotion, discipline, salary reduction, job reassignment or any other type of unfair treatment.

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Those who retaliate against a reporter will be subject to disciplinary action, including but not limited to termination. If you believe you have been a subject of retaliation because you raised a concern, you must report this using any of the reporting avenues.

Please note that making a report in good faith does not shield an employee from disciplinary action that is totally unrelated to the report itself. In other words, the Company's non-retaliation policy does not mean that an employee-reporter cannot be disciplined in the ordinary course of business.

d. Anonymous Reporting

When a report is made through the Company's compliance hotline, either the phone or the website, the reporter has the option to submit it anonymously. The system allows for the reporter and the investigator to communicate with each other while still protecting the identity of the reporter. But even when a report is made through a means that reveals the reporter's identity, the reporter can still request to remain anonymous. His or her identity will not be anonymous to the person receiving the report, but it will be anonymous for the rest of the investigative process.

Often times, anonymous reports are harder to investigate because it is challenging to communicate with the reporter to ask follow up or clarifying questions. Accordingly, the Company encourages reporters to consider making a confidential but not anonymous report. If an anonymous report is the chosen route, the Company encourages reporters to provide as much information, details and specifics as possible.

7. Protection from liability for disclosing restricted information

In any jurisdiction where the disclosure of information is restricted on privacy or other similar grounds, a whistleblower will not be considered as having violated those restrictions when reporting suspected wrongful activity in good faith pursuant to this policy and will be protected from liability when disclosing such information.

8. How do I submit a report?

The Company supports multiple reporting channels that can be used to report suspected wrongful activity. A reporter should choose the channel with which he/she feels the most comfortable.

- a. Reports can be made to any member of Company management
- b. Any member of the Human Resources Department
- c. Anyone in the Legal or Compliance Departments
- d. Through the compliance hotline – either via phone or website

The compliance hotline, which is also sometimes referred to as EthicsPoint, is managed by a third party company called Navex. When a reporter calls the local [hotline number](#), it is answered by a Navex employee in the local language. If a reporter chooses to submit a report via the [website](#), the site can be translated into 20 different languages. The reporter has the option to remain anonymous.

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9. How are reports investigated?

Once a report is submitted, it is assigned to a Company investigator. Usually an investigator is assigned within 1-2 business days from when the report is received. The investigator will be selected based on the nature of the report but it could be an HR manager, someone from Legal/Compliance, EHS personnel or someone from Internal Audit.

The investigator will make contact with the reporter and ask any follow up or clarifying questions. For anonymous reports submitted through the compliance hotline, the system facilitates communication between the reporter and the investigator on an anonymous basis. For this reason, it is important for reporters to periodically check the system (using the login key number provided at the time of report submission) to see if there are any messages from the investigator.

Most cases close within 30 days from the date of submission, but complex cases or cases involving many people can take longer. Once the investigation is complete, the reporter will be notified.

10. Questions?

Any questions regarding this policy can be raised with a member of the Company's Legal/Compliance Team, HR Department or by emailing Compliance@univarsolutions.com.

11. History of Revisions

Revision Date	Section Number	Description/Modification
August 2021		Extensive policy rewrite
January 2019		General revision to the content of the Policy; inserted definitions.
May 2017		Incorporated rights to report to government or an appropriate regulator.
Sept. 20, 2016		New