

# Procedure ethical guidance and complaints

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## 1 Aim / objective

Barco is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in its business activities. A crucial element is the commitment to foster an open culture where everyone feels secure in seeking ethical advice and raising concerns.

Barco encourages you to speak up when you are aware or have reasons to believe that there has been a breach of applicable laws or regulations, the Code of Ethics or company policies.

There are channels available to speak up and raise concerns.

Your primary contact for ethical guidance or reporting a (suspected) violation is your manager. This is the first-line reporting channel.

If you do not feel comfortable talking to your manager, you can reach out to your HR business partner, your local legal & compliance responsible ('country manager'), or any of the legal counsels. These are alternative reporting channels that are available any time.

Moreover, Barco has created an Ethics Committee to which you can reach out if you feel insufficient attention or response is given to an issue you raised through a channel above, or if you prefer to raise your concern directly at a central level.

You can contact the Ethics Committee via email ([ethics@barco.com](mailto:ethics@barco.com)) or by using the Ethics Helpline ([ethics.barco.com](http://ethics.barco.com)).

The Ethics Helpline is the tool you can use to report your concerns in a safe, reliable, and, if need be, anonymous way. It can be used as a first reporting channel or as an escalation channel.

Anyone who submits a complaint in good faith will be protected against any Retaliation.

## 2 Scope

This procedure applies to any person who uses reporting channels for ethical guidance, reports and complaints described in this procedure.

This procedure shall not affect employees' rights to consult their representatives or trade unions and on protection against any unjustified detrimental measure prompted by such consultations.

The channels are provided to seek ethical guidance, raise ethical questions or concerns, to report suspected or actual violations of applicable laws and regulations, the Code of Ethics or company policies, or to submit complaints related thereto.

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The goal of these channels is not to resolve conflicts between employees or between an employee and his or her manager in the exercise of their professional tasks. Differences in opinions or even good faith conflicts on the company's operations (strategic choices, business plans, resources, staffing, job performance, etc.) should not be addressed through these channels unless they go hand-in-hand with acts or behavior of an employee or manager that violate the Code of Ethics, company policies or the law.

The goal of these channels is neither to resolve merely commercial conflicts which may arise between Barco and its suppliers, service providers, partners, distributors, resellers or customers in the ordinary course of business.

## 3 Who are covered?

This procedure is intended to apply to the following persons:

- Current and former employees;
- Contractors;
- Shareholders, directors (including non-executive directors);
- Suppliers and contractors (including sub-contractors and employees of contractors);
- Consultants;
- Applicants;
- Paid and unpaid trainees;
- Volunteers; and
- Facilitators.

## 4 How can reports be made?

### 4.1 What channels can be used?

The following reporting channels are available:

1. Line management and local support (informal and formal channels)

You may raise concerns:

- face-to-face, by phone, or via chat with your manager;
- with your HR business partner;
- with your local legal & compliance responsible ('country manager'); or
- with any member of the Legal & Compliance team.

2. Ethics Committee (HQ channel)

You may contact the Ethics Committee directly if:

- you prefer not to use local channels;
- you feel uncomfortable raising the issue at your level or location; or
- you believe insufficient attention or response has been given to a previously raised concern.

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The Ethics Committee can be contacted:

- via email: [ethics@barco.com](mailto:ethics@barco.com); or
- via the Ethics Helpline.

### 3. Ethics Helpline (secure and anonymous channel)

Our Ethics Helpline makes it easy for you to speak up securely and, if needed, anonymously when you experience ethical issues on the workfloor or have ethical concerns.

You can:

- Go to [ethics.barco.com](https://ethics.barco.com) to submit your concern or complaint, or
- Call free of charge to speak to a representative. The call center supports multiple languages and dialing instructions can be found by going to the [ethics.barco.com](https://ethics.barco.com) and selecting your country.

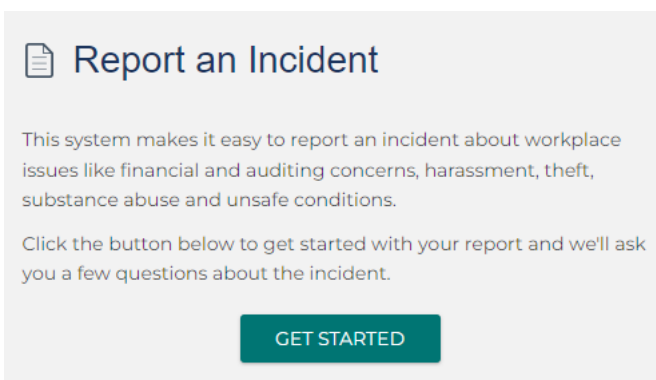
Your report will be forwarded instantly for review and follow-up by the Ethics Committee. After submission, you will receive an access code so you can track the status and send and receive messages anonymously about your report at [ethics.barco.com](https://ethics.barco.com).


Any information you provide is stored confidentially and securely.

To keep an overview of all questions, reports or complaints, and facilitate the reporting on, and auditability of Barco's ethics program, the Ethics Committee shall use the Ethics Helpline to log incidents or reports brought to its attention via the ethics mailbox ([ethics@barco.com](mailto:ethics@barco.com)) and to respond to such emails.

## 4.2 How to raise an ethical question, report an incident or submit a complaint via the Ethics Helpline?

You can report an incident by accessing [ethics.barco.com](https://ethics.barco.com) and then clicking 'Get Started'.



 **Report an Incident**

This system makes it easy to report an incident about workplace issues like financial and auditing concerns, harassment, theft, substance abuse and unsafe conditions.

Click the button below to get started with your report and we'll ask you a few questions about the incident.

**GET STARTED**

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You will be directed to the following page, where you click on "Report an Incident"

## Ethics Helpline

In this reporting system you can quickly and easily report concerns about actual or suspected misconduct that can affect our company or the well-being of people.

The reporting system should not be used to make false accusations against others or report information that you know is untrue.

We encourage you to provide your name in the report. Regardless of whether you do so or not, please open a secure Inbox. This makes it safer and easier for us to communicate.

All reports are strictly confidential. You can find more information on this in the "Privacy policy" section above.

Reports relating to potential misconduct in member states of the European Union or identified by whistleblowers within the European Union can also be reported to external authorities. You can find an overview [here](#).



As a first step, you will be asked to select the country where the incident occurred.

Make a report

Where did the incident occur? \*

Secondly click yes on the message that pops up.

This service is not an emergency hotline or a substitute for contacting law enforcement.

The information you submit via this service may not be reviewed immediately.

If you are facing a life-threatening emergency or believe you are facing the threat of imminent bodily harm, please contact your local police or emergency responders immediately.

Cancel Yes

Then select an issue type to categorize the incident you are reporting. For a request for ethical guidance or the disclosure of a potential conflict of interest, please choose 'other'.

Which of the categories below best describes the nature of your report?

- Accounting/Audit Concerns
- Compliance/Regulation Violations
- Conflict of interest
- Corruption or bribery
- Fraud
- Mistreatment
- Other
- Retaliation

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- Unprofessional behavior
- Protection of Privacy & Personal data, and security of network and information systems

In the next phase you must give a description of what happened exactly and who was involved, as well as indicate in which Barco location the incident occurred.

Description \*

Who was involved?

Please indicate where the issue occurred \*

Now you can give a specific date or a general time frame of when the incident occurred.

Please indicate when the issue occurred \*

- I know the specific date and time
- I will provide a general timeframe

When clicking on "I know the specific date and time", please fill in

Date \*

When clicking on "I will provide a general timeframe", please fill in

Enter a general timeframe (e.g. 'last week') \*

Lastly, you may provide some information about yourself and submit the report either anonymously or provide your contact details.

Your Relationship to the Organization: \*

- I am currently an employee
- I am a former employee
- Non employee (this includes contractor, student, supplier, partner, member, etc.)

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## Contact information

You can choose to submit the report anonymously, but we encourage you to provide your name and contact details in the fields below.

Stay anonymous

Name \*

Phone number

Required. Only numbers and the following characters are valid: + ( )

Email

Required. Please enter a valid email address

Or

Stay anonymous

Email

This email will only be used for notifications. Investigators and your employer will not have access to it.

Finally, you will be asked to enter a password. Please save this password and the generated case ID, as you will need both for checking the status of the incident

## Secure Inbox

Please open a secure inbox by creating your own password, even if you have already given your contact details. In this way we can ensure that protected communication will continue to take place.

After you submit the report, you will be given a randomly generated Case ID. Please make a note of this along with your password. You must use both to log in the Inbox.

Use your inbox if you want to send more information about the case or see case-related information from us. If you wish, all communication with us remains anonymous.

Once your case has been processed, you can find the answer to your request in the Secure Inbox. If you have provided your email address, you will receive an automatic notification once a message has been added. If you have chosen anonymous reporting, please log in regularly to see if you have received any message.

## Enter your password

Password \*

Repeat password \*

### Security validation



Enter characters \*

Next

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## Confirmation

Thank you. We have received your case. We will start processing the case as soon as possible.

Once your case has been processed, you can find the answer to your request in the Secure Inbox. If you have provided your email address, you will receive an automatic notification once a message has been added. If you have chosen anonymous reporting, please log in regularly to see if you have received any message.

Your Case ID: **QQQ7-FAE1DBE3** [Copy Case ID to clipboard](#)

Please make a note of the following Case ID as it is proof that you sent this report and that it was duly received. You can use it, together with your password, to log in at any time. You can view our feedback and, if you wish, enter into another, protected dialogue. Thank you

### Note

You have opened a secure Inbox. To log into the Inbox, you must use the password you just typed in. If you forget one of your credentials (Case ID or password), you will need to submit a new report. For security reasons and protection of your anonymity, we cannot recover them.

### Check Status

You can check the status of your report or question using the access number and password you created when you submitted the report or question.

Access Number  Password

[Forgot your password?](#)

**CHECK STATUS**

## 5 How do we treat ethical questions, incident reports or complaints?

All questions, reports or complaints are taken seriously and will be assessed diligently and thoroughly. You will receive a confirmation of receipt within 7 days. No later than 3 months after this confirmation, you will receive feedback on your question, report or complaint.

The questions, reports and complaints are handled by the Ethics Committee, consisting of representatives of the central support functions. Depending on the nature and sensitivity of the matter, the Ethics Committee may reach out to the General Counsel or CHRO for assistance and advice. For particularly sensitive or complex cases, the General Counsel or CHRO may seek the advice of the Chairman of the Audit Committee.

Following the investigation of a report or complaint, Barco may take certain actions depending on the nature and gravity of the reported conduct or circumstances. Where misconduct is confirmed, Barco will take appropriate remedial action proportionate to the seriousness of the misconduct, in accordance with its established procedures and practices. Reasonable and necessary steps will also be taken to prevent any recurrence of the misconduct.

On an annual basis, the Ethics Committee provides the Audit Committee with a generic overview of the reported matters on a 'no-names' basis.

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## 6 No Retaliation

Reporting persons are protected against Retaliation, including threats of Retaliation and attempts of Retaliation.

The measures for the protection of reporting persons shall also apply, where relevant to:

- a) Facilitators;
- b) Third persons who are connected with the reporting persons and who could suffer Retaliation in a work-related context, such as colleagues or relatives of the reporting persons; and
- c) Legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context.

Persons who reported or publicly disclosed information on breaches anonymously, but who are subsequently identified and suffer Retaliation, shall nonetheless qualify for protection, provided that they meet the conditions laid down in the law or regulation.

Retaliation is reportable under this procedure itself, which will result in disciplinary action, up to and including termination of employment. If you have been subject to any conduct that you believe constitutes Retaliation, please immediately report the alleged Retaliation following the guidance of this procedure.

This procedure does not exempt anyone from the consequences of his or her own misconduct or omissions. For example, a colleague who reports an incident or submits a complaint may still face disciplinary action for his or her own misconduct.

## 7 Confidentiality

Your interactions with the Ethics Committee will be treated confidentially (meaning that the identities disclosed and the reports received will only be known by a limited number of people, i.e. those who have a need to know for the investigation or remedial actions).

Barco shall ensure that the confidentiality of the identity of the reporting person and any third party mentioned in the report is preserved.

Barco shall only disclose the identity of the reporter with the free and express consent of the reporter to anyone other than the authorized staff members responsible for receiving or following up reports.

Notwithstanding the aforementioned, the identity of the reporting person and any other information from which the identity of the reporting person can be directly or indirectly deduced may only be disclosed if it is a necessary and proportionate obligation under special legislation in the context of investigations by national authorities or legal proceedings. Reporters will be notified before their identity is



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Facilitator	means a natural person who assists a reporting person in the reporting process in a work-related context, and whose assistance should be confidential;
Retaliation	means any direct or indirect act or omission which occurs in a work-related context, is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person;

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## **12 Annex A – External reporting channel – for Italy only**

This Annex A applies to all employees working at Barco S.r.l. with registered office at Via Saul Banfi 1, 21047 Saronno, Italy.

Besides reporting an incident via our Ethics Helpline, you also have to possibility to report an incident via the external reporting channel established by the ANAC and accessible on their website (<https://www.anticorruzione.it/>). This external report channel can only be used if:

1. the Ethics Helpline is not active;
2. you have already made a report to the Ethics Helpline and it has not been followed up;
3. you have reasonable grounds to believe that, if you made an internal report through the Ethics Helpline, it would not be followed up or the report could lead to the risk of Retaliation;
4. you have reasonable grounds to believe that the violation to be reported may constitute an imminent or obvious danger to the public interest.

You can report an incident relating to the following violations via the ANAC reporting channel:

1. offenses that fall within the scope of application of the European Union or national acts relating to the following sectors: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems;
2. acts or omissions detrimental to the financial interests of the European Union;
3. acts or omissions relating to the internal market, including infringements of the European Union competition and state aid rules, as well as infringements relating to the internal market linked to acts infringing corporate tax rules or mechanisms the purpose of which is to obtain a tax advantage which defeats the object or purpose of the applicable corporate tax legislation;
4. acts or behaviors that nullify the object or purpose of the provisions of the European Union acts in the sectors indicated in the previous numbers.

To use this external reporting channel or to resort to public disclosure, please refer to the guidelines and the official ANAC website.