

# Procedure whistleblower channels

---

## Table of content

1	Aim / objective	2
2	Scope	2
3	Who are covered?	2
4	How can reports be made?	3
4.1	What channels can be used?	3
4.2	How to report an incident	3
5	How do we treat whistleblower reports?	7
6	No Retaliation	7
7	Confidentiality	8
8	Anonymous reports	8
9	Data protection	8
10	Related documents	9
11	Abbreviations & Acronyms	9

# Procedure whistleblower channels

---

## 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 our business activities. A crucially important element of this is the commitment to an open culture where people feel secure in seeking advice and raising concerns.

Barco encourages you to speak up when you know or suspect that there has been a breach of applicable laws or regulations, the Code of Ethics or company policies.

Your primary contact for ethical guidance or reporting a (suspected) violation is your manager. If you do not feel comfortable talking to your manager, you can reach out to your HR business partner, your local legal & compliance responsible, or any of the legal counsels.

Moreover, Barco has created an Ethics Committee to which you can reach out via email ([ethics@barco.com](mailto:ethics@barco.com)) if you feel insufficient attention or response is given to an issue you raised.

Finally, pursuant to the EU Whistleblowing Protection Directive, in order to enable you to report your concerns through a safe and reliable means, Barco has implemented this procedure for the receipt, retention, and treatment of whistleblower reports.

You can submit whistleblower reports anonymously (meaning that the identity of the reporter will not be known by anyone) and/or confidentially (meaning that the identities disclosed and the reports received will only be known by a limited number of people – these who have a need to know for the investigation or remedial actions) as further outlined below.

Individuals who make reports will be free from any retaliation for making the report.

## 2 Scope

This procedure applies to any person who uses the whistleblower channels described herein 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.

## 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;

# Procedure whistleblower channels

---

- Paid and unpaid trainees;
- Volunteers; and
- Facilitators.

## 4 How can reports be made?

### 4.1 What channels can be used?

At Barco, we're dedicated to creating an ethical and engaged culture. We encourage you to reach out to us.

Our Ethics Helpline makes it easy for you to speak up anonymously and securely when you experience issues inside the workplace or have concerns. This tool provides easy options for you to reach out:

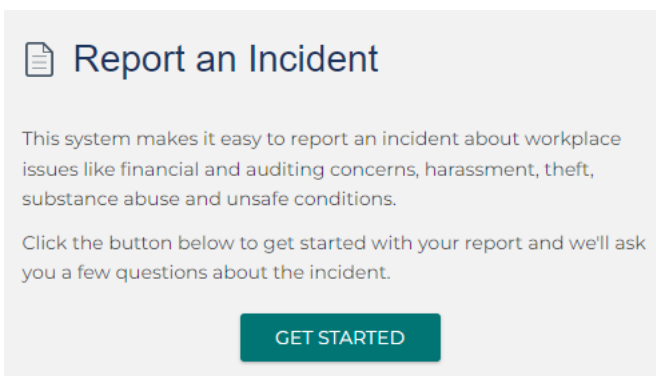
- Go to [ethics.barco.com](https://ethics.barco.com) to submit your concern online.
- Call free of charge to speak to a representative. The call center supports multiple languages and dialing instructions can be found by going to the [ethics.barco.com](https://ethics.barco.com) and selecting your country.
- Request a face-to-face meeting by sending an email to [ethics@barco.com](mailto:ethics@barco.com).


Your report will be forwarded instantly for review and follow-up by the compliance function. 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 confidential and securely.

### 4.2 How to report an incident

You can report an incident by accessing [ethics.barco.com](https://ethics.barco.com) and then clicking 'Get Started'. This immediately brings you to the form itself. You can change the language of the form at the top of the page, in the right corner. This gives you the option to file a report in your own language.



 **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](#)



 English (United States) 

# Procedure whistleblower channels

As a first step, you will be asked to choose an issue type to categorize the incident you are reporting.

Organization: Barco

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

Search categories:

Accounting/Audit Concerns

The purposeful or unethical recording of accounting or auditing matters. Examples may include: fraud; deliberate errors related to financial statements or noncompliance with accounting controls.

Compliance/Regulation Violations

Violations of or failure to comply with a rule, regulation, law, operating procedure, past practice or protocol for any aspect of the Company.

Conflict of Interest

A situation where a person in a position of trust has competing professional or personal interests which can make it difficult to impartially perform the assigned job duties.

Corruption or Bribery

Any suspected corrupt practices, bribery, or illicit payments, whether foreign or domestic, including providing or offering something of value to induce another person to violate their legal or ethical responsibilities.

Fraud

The deceitful practice of obtaining money or property through intentional use of false pretenses, false documents, or misrepresentation. An illegal conversion of assets or property of value to one's own use.

Mistreatment

The act of being treated differently than prescribed by company policy, by law or by the ethical norms of society. Mistreatment may include physical, verbal, or psychological abuse, injuring, persecution, or may involve subtle behavior such as neglect, isolation, wrongful discipline, termination, or discrimination.

Other

Please use this Incident Type if you do not feel that the provided list of incidents describe the activity on which you are making a report.

Protection of Privacy and Personal Data, and Security of Network and Information Systems

Concerning the processing of personal data and the protection of privacy in the electronic communications sector, protection of natural persons with regard to the processing of personal data and on the free movement of such data, measures for a high common level of security of network and information systems across the Union.

Retaliation

Any form of discrimination involving action(s) against an individual because he or she has either opposed an unlawful employment practice or made a charge, testified, assisted or participated in an investigation, proceeding or hearing involving employment discrimination.

Unprofessional Behavior

Behavior that violates a norm or policy of expected behavior in the workplace, typically directed towards other individuals or to the company.

[Tell us what happened](#)

Secondly you must give a description of what happened exactly and who was involved.

## 1 Issue Details and Involved Parties

Description \*

65,536 characters remaining

Who was involved?

[ADD](#)

# Procedure whistleblower channels

---



# Procedure whistleblower channels

Next, you will have to include more details about where and when it happened. A specific Barco location can be chosen. You can give a specific date or a general time frame of when the incident occurred. After that, you will have the option to provide pictures or file, which is not mandatory.

## 2 Issue Date and Location

Please indicate where the issue occurred \*

Company Location

[Click here to select a company location from a list](#)

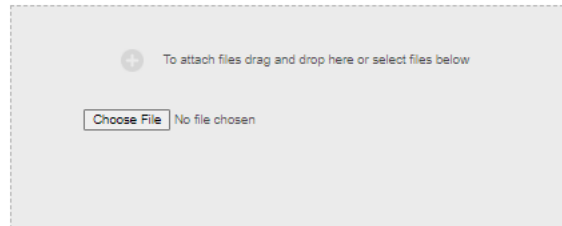
Please indicate when the issue occurred \*

I know the specific date and time

Date  Time

I will provide a general timeframe

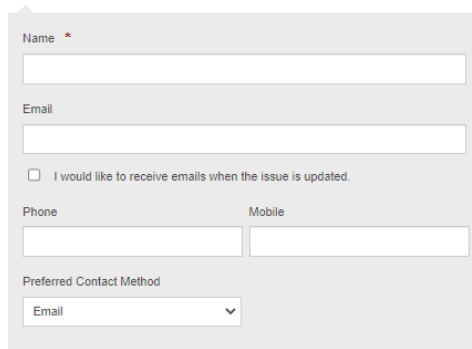
## 3 Photos or File Uploads



Lastly, when submitting a report, you may provide some information about yourself or you submit a report anonymously.

## 4 Tell Us About Yourself

Share your name and contact information ⓘ



Remain anonymous toward the organization ⓘ

Remain completely anonymous ⓘ

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.)

## 5 How do we treat whistleblower reports?

All reports will be taken into consideration and will be diligently and thoroughly investigated by the compliance function. You will receive a confirmation of receipt of your report within 7 days. Within 3 months after the confirmation of receipt, you will receive feedback on your report.

Following the investigation of a report, Barco may take certain actions depending on the nature and gravity of the conduct or circumstances reported. If misconduct has been confirmed through an investigation, Barco will take prompt and 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 further occurrence of misconduct.

## 6 No Retaliation

Reporting persons are protected against Retaliation, including threats of Retaliation and attempts of Retaliation including in particular in the form of (not limited to):

- a) Suspension, lay-off, dismissal or equivalent measures;
- b) Demotion or withholding promotion;
- c) Transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- d) Withholding of training;
- e) A negative performance assessment or employee reference; or
- f) Any other form of adverse employment action, suspension, discipline, threats, intimidation, or harassment.

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.

# Procedure whistleblower channels

---

This procedure does not excuse colleagues from the consequences of their own misconduct. For example, a colleague who makes a whistleblower report could still face disciplinary action for unrelated misconduct.

## 7 Confidentiality

Barco shall ensure that the confidentiality of the identity of the reporting person and any third party mentioned in the report is protected, and prevents access thereto by non-authorized staff members.

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 disclosed, unless such information would jeopardize related investigations or legal proceedings.

## 8 Anonymous reports

When using one of the reporting channels described in this procedure, you are encouraged to identify yourself. However, anonymous reports can be made subject to applicable laws and regulations.

Making a report anonymously may affect our ability to investigate the matter or offer protection to the whistleblower. Anonymous whistleblowers are particularly encouraged to provide as much concrete information and evidence as possible.

## 9 Data protection

Personal data that is clearly not relevant to the handling of a specific report will not be collected, or if collected unintentionally, will be immediately erased.

The name, position and contact details of both the reporter and each person to whom the protection and support measures extend, as well as the data subject, are retained until the reported breach is time-barred.



## 10 Related documents

Code of Ethics

EU Whistleblowing Protection Directive

“Belgische wet van 28 november 2022 betreffende de bescherming van melders van inbreuken op het Unie- of nationale recht vastgesteld binnen een juridische entiteit in de private sector”

The National Anti-Corruption Authority (ANAC) approved, on July 12, 2023

“Whistleblowing guidelines on the procedures for the submission and management of external reports, pursuant to Article 10 of Legislative Decree No. 24 of 10 March 2023 Implementing the EU Whistleblowing Directive”

## 11 Abbreviations & Acronyms

ANAC	The Italian National Anti-corruption Authority;
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;

## 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 Lorenteggio 270°, 20152 Milan, Italy and FIMI S.r.l. with registered office at Via Vittor Pisani n.6, 20124 Milano, 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.

# Procedure whistleblower channels

---

