

Compliance Action Line – Process Description

This document gives a brief overview on what happens with a report received, what steps can be taken and what form of feedback the reporter may expect.

Process steps

What happens after I made my report?

All reports, no matter which channel they are made through - via the Compliance Action Line (CAL), any other incoming channel or Employee Service Center (US) - will be reviewed by the Company. Every Reporting Person will receive acknowledgment of receipt of the report, in cases where such communication is possible, within seven days of that receipt. Follow-up questions may be raised to gain further background information on the concerns.

The matter proceeds in the following steps:

Assessment and Assignment (Follow-Up)



All incoming reports are assessed in a timely manner. Only if enough information is provided, the company can follow-up and start, for instance, an investigation. Depending on the topic, the cases are categorized and assigned to the Subject Matter Experts. For instance, HR related cases will be assigned to HR as they can review these concerns best. Once the assignment is made, the concerns are reviewed and investigated.

Internal Investigation / Internal Review

The company will review the matter at hand, which may include interviews as appropriate, fact gathering and documentation review. At the end of an internal investigation/review, the results and findings will be summarized, and conclusions will be drawn. From these conclusions, remediation measures will be proposed to and discussed with relevant stakeholders. Moreover, responsibility to implement specific remediation measures will be assigned to the appropriate teams/functions.





Feedback to Reporter

When a report is made via the Compliance Action Line or directly to the GID, you will receive **acknowledgment of receipt** of the report, in cases where such communication is possible, **within seven days of that receipt**, unless you have explicitly requested otherwise, or the company believes that acknowledging receipt of the report would jeopardize the protection of your, the Reporting Person's, identity.

GID will provide **feedback** to you **in a reasonable timeframe not exceeding three months from the acknowledgment of receipt**, or six months in duly justified cases. GID will communicate to you the final outcome of the investigation triggered by the report, in accordance with procedures provided for under applicable national law and in accordance with the interests of the Company. Whilst a reasonable timeframe for a standard investigation should not exceed three months, the nature and complexity of the matter may sometimes require a longer investigation period. In such cases, and where the determination of the appropriate follow-up takes more time, you may be informed about this and about any further feedback to expect.

At a minimum, you will hear whether your matter is still under investigation, and you will hear when it is closed. We understand that informing Reporting Persons comprehensively, to the extent legally possible, is crucial for building trust in the effectiveness of our investigations. We do our best to meet Reporting Persons' reasonable expectations to that effect. The circumstances and applicable law, however, may not allow for us to share information about, for e.g. the precise status, parties involved, the findings or the result of the investigation, including possible actions taken to address the issue.

Even if you have reported anonymously to the Compliance Action Line, you will receive a complaint number and a password and will have the opportunity to check the status of your matter online, if you chose this option at the time of filing your report.

Appeal Process

The Reporting Person will receive a notification, that the internal investigation/review or appeal has been concluded. In certain cases, involving human rights and environment impacts, the Reporting Person may appeal the resolution, within seven days from the communication of the proposed resolution of the concern. The appropriate team will handle the appeal and review the matter independently and impartially.



The appeal phase will be finalized in a period from one to three months. In cases not subject to an appeal, the internal investigation/review is closed.

At the end of any appeal, any responsibility to implement appropriate remedy actions and measures will be assigned. The outcome of the appeal is final. For more information on the appeal process, please contact humanrights@fmc-ag.com



Conclusion of the Internal Investigation/Review

The Reporting Person will receive a notification, that the internal investigation/review or appeal has been concluded. As mentioned above, in cases not subject to an appeal, the internal investigation/review is closed, and the level of details shared depends on the specific local legal legislation or other important considerations. The circumstances and applicable law may not allow for us to share information about, for e.g. the precise status, parties involved, the findings or the result of the investigation, including possible actions taken to address the issue.

Documentation

The outcome of the internal investigation/review and the appeal, if applicable, is recorded in the company's case management system and periodically monitored, to ensure proper implementation of any remedy. At the end of an internal investigation/review and/or appeal, the documentation will be filed in the respective directory of the investigating body.

