

SpeakUp!

Who, what, how





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We all have a responsibility to do the right thing

Being a safe, responsible and sustainable company matters to us. Our Code of Conduct explains what our core principles of Safety, Integrity and Sustainability mean in practice. It also sets out the standards of behaviour we expect from everyone – no matter where they sit in the company or the role they play. Everyone who works for us should follow our Code and the directives that support it. We've all got a responsibility to do the right thing. That means if we believe that the law, our Code or any of the directives is being, or is about to be, violated, we should take action.



This manual explains the different ways you can raise a concern about a violation of our [Code of Conduct](#). Anything you report will be treated confidentially and will be taken seriously. There are no repercussions for reporting a concern in good faith, even if it turns out to be unfounded.

Complying with our Code and reporting any concerns is important to the company and ourselves, and lets those we do business with know that we will always apply the highest ethical and legal standards to everything we do. This supports our reputation in the market and the communities we operate in.

And most importantly, it gives people the confidence to trust us and do business with us.

Visit the [SpeakUp! portal](#) for more guidance and information.

What should I do if I think our Code is being violated?

Openness and honesty is something we value highly at AkzoNobel.





It's important that we all give each other feedback and guidance when it comes to following our Code of Conduct and living up to our core principles of Safety, Integrity and Sustainability. If you're concerned that our Code is being violated, please raise your concern. Don't keep it to yourself or ignore it.

Minor issues are best dealt with by speaking directly and promptly to the person involved. For anything else, you should speak to your manager, HR Business Partner or Compliance Officer.

But if you're not comfortable raising your concern in any of these ways, we've also got a more formal grievance reporting mechanism called SpeakUp!

It's designed so that employees and interested third parties can raise concerns regarding our Code of Conduct in confidence. It allows us to identify risks, fix issues and control any damage to our company while protecting the individuals who've alerted us to the issues.

SpeakUp! is in addition to existing reporting procedures. If at any point the rules in this manual conflict with the law in your country, the law always prevails.

Who can raise concerns?

SpeakUp! is available to anyone who wants to raise a concern about a violation or potential violation of our Code of Conduct or any of the directives that support it.

This includes employees, contractors, former employees, business partners, customers, people affected by AkzoNobel products or activities and investors in AkzoNobel shares.

People outside our company can find guidance on using SpeakUp! on akzonobel.com

SpeakUp! reports made by employees are governed by the rules outlined in this manual and in Directive 7.11 and Rules 7.11.01 on Code of Conduct violations.

What sort of concerns can I raise?

You can use SpeakUp! to highlight any kind of conduct that you think is breaking our Code of Conduct or our directives. This applies to past, present or future issues.

Here are some examples:

- Bribery and corruption, facilitation payments, gifts and entertainment that don't meet our guidelines
- Inadequate auditing and accounting
- Violations of competition law or trade controls and sanctions
- Environmental, health and people, product and process safety violations and issues
- Unauthorised disclosure of confidential information
- Conflicts of interest
- Insider trading
- Misuse of company resources
- Fraud
- Discrimination and harassment
- Breaches of human rights
- Retaliation

If you deliberately make a false accusation or deliberately abuse the SpeakUp! reporting process in any way, this will be viewed as a violation of our Code.

SpeakUp! isn't for....

...Concerns about the quality or performance of products and services

There are complaints and customer service procedures already available for that.

...Reporting serious incidents

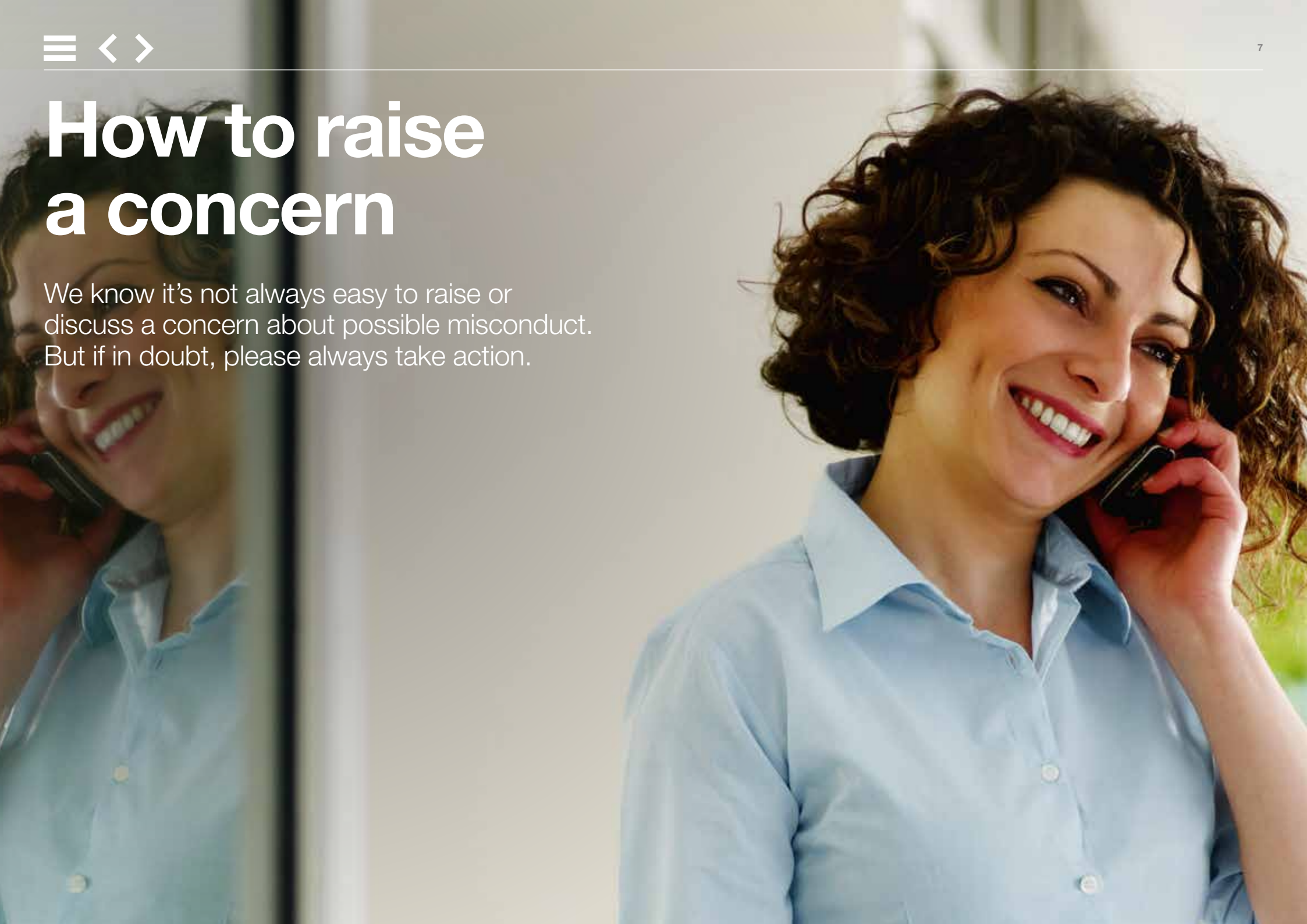
This includes emergency incidents, safety incidents, medical incidents or travel incidents. For help and guidance on how to manage these, visit our [travel security page](#) and [Rules 12.01.5](#) on emergency response.

...Disagreements with management decisions

This means business strategy and decisions, performance evaluations or salary and benefit decisions. Unless, of course, you think the decision concerned is a potential violation of the Code. If in doubt, speak to your [Compliance Officer](#) or our Legal Group's Compliance function ('ALG-Compliance').

How to raise a concern

We know it's not always easy to raise or discuss a concern about possible misconduct. But if in doubt, please always take action.



Code of Conduct

How to raise a concern

We stand for our Code. If we see something wrong, we should act.

Read more about SpeakUp!
on the [SpeakUp! portal](#)

Give feedback

Raise your concern with the person involved and refer to the rules of the Code or Directives.

or

Inform management

Inform your manager, HR Business Partner or Compliance Officer about the concern.

or

Use SpeakUp!



Call the
SpeakUp!
helpline



Use the
SpeakUp!
website



Send a report
to SpeakUp! by
e-mail or post

There are no repercussions for reporting a concern in good faith, even if it turns out to be unfounded.



We'll take your concern seriously and deal with any issue appropriately and confidentially. And remember, there are no repercussions for reporting a violation of the Code in good faith, even if it turns out to be unfounded.

You can tackle a concern in the following ways:

Give feedback

It's important we give each other feedback. If possible, you should always raise your concern with the person involved first by speaking to them honestly and promptly. Minor issues are almost always best dealt with this way.

or

Inform management

If you believe that the situation can't be resolved by talking to the individual, you can speak to your manager or next higher manager instead. You could also talk to your HR Business Partner or Compliance Officer. They will listen to your concerns and take appropriate action.

or

Use SpeakUp!

If you suspect a potential Code of Conduct violation and are uncomfortable speaking to the person involved, your manager, the HR Business Partner or the Compliance Officer, you can use SpeakUp!

There are three different ways to raise a concern through SpeakUp!

Call the SpeakUp! helpline

Your call will be answered by an independent external operator from Navex Global/EthicsPoint, the company who provides third party reporting by telephone or internet on behalf of AkzoNobel. The operator will listen to your concerns and may ask additional questions. In most cases, the [SpeakUp! helpline](#) will initially be answered in English. If you would like to report your concern in a different language, the operator will invite an interpreter to the call. You can find a list of country-specific helpline numbers on the [SpeakUp! portal](#). The lines are toll-free and operated 24/7 throughout the year.

Use the SpeakUp! website

You can file a report through the [SpeakUp! portal](#). Click on 'create a SpeakUp!' or visit akzonobel.ethicspoint.com to submit your concern. Full instructions in several languages and a Q&A section are available on the site.

Send a report to SpeakUp! by e-mail or post

You can contact speakup@akzonobel.com or AkzoNobel Director Compliance, PO Box 75730, 1070 AS Amsterdam, The Netherlands. Any reports made to these addresses will be handled by AkzoNobel's Director Compliance or their delegate. Reports sent for the attention of the CEO and/or General Counsel will be treated as reports sent to the Director Compliance. If your concern relates to the Director Compliance or another member of the Compliance Committee, you can report to the General Counsel, or, if your concern relates to the General Counsel, to the CEO.

Potential Code of Conduct violations that may lead to significant consequences for the company or an individual, such as fines or imprisonment, should be reported to management or the ALG-Compliance immediately.

External whistleblowing

We know that in some situations you may wish to raise your concern with an external body. We encourage you, however, to raise your concern with AkzoNobel first. That gives us an opportunity to collect the facts and assess the risks and consequences. We will address your concern in a serious, confidential and objective way, consistent with our core principles.

Level of detail

When making a SpeakUp! report, please give as much detailed information as possible to help us assess and investigate your concern. Such as:

- The background, history and reason for the concern
- Names, dates, location, businesses, places and other relevant information
- Any documents or other materials that might support your report

A report can only be followed up if we have sufficient information. You don't have to provide evidence to prove the allegations in your report, but you should be able to show a reasonable belief that the Code of Conduct has been breached.

Privacy laws

In some countries, privacy laws limit what you may report via SpeakUp! If you contact the SpeakUp! helpline or website, the type of concern that may be reported will be listed. If your type of concern is not on that list, please contact your manager, Compliance Officer or ALG-Compliance for guidance.

Our key principles

There are no repercussions for reporting a violation of the Code in good faith.



To provide comfort to report concerns and protection for reporters, we apply three key principles: Non-retaliation, Confidentiality and Anonymity.

Non-retaliation

Employees who SpeakUp! are protected. This means there are no repercussions for anyone reporting a violation of the Code in good faith, even if it turns out to be unfounded.

Here are examples of the kind of behaviours that should never happen as a result of your report. These won't be tolerated.

- Blaming you for causing a problem, because you filed a report
- Threatening or harassing you
- Talking or gossiping about the report or a witness's participation in the investigation
- Remarking that you should transfer to another department or quit your job

In essence, you should be treated as if no report was filed. We guarantee that no disciplinary measures or other steps will be taken against you for raising a genuine concern, even if your concern later turns out to be unfounded, mistaken or misguided.

Until a decision is taken on the report there is always a presumption of good faith. Various laws in the countries in which we operate, provide statutory protection for whistle-blowers. AkzoNobel respects and follows those laws.

But remember, you won't be protected if you willingly made false accusations or abused SpeakUp! Filing a report in bad faith is a violation of the Code of Conduct in itself.

Confidentiality

We treat all reports in confidence, as far as we possibly can. We consider confidentiality at every stage, but there are some circumstances where we may need to share information about a SpeakUp! report.

For instance, information may be disclosed in the following situations:

- To ALG-Compliance staff managing the Code of Conduct matter database
- To the relevant Compliance Officer and case manager
- To the individual involved and witnesses interviewed, unless specifically requested otherwise
- To Compliance Committee members
- To the relevant Compliance Committees for decision making as explained below
- To management for follow-up
- To authorities, if required by law

We are committed to restrict sharing of the information to those people who have a need-to-know.

All parties, including the person involved, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. This means you also have a responsibility to keep the matter confidential, to be discreet and preferably not discuss your report with colleagues or others.

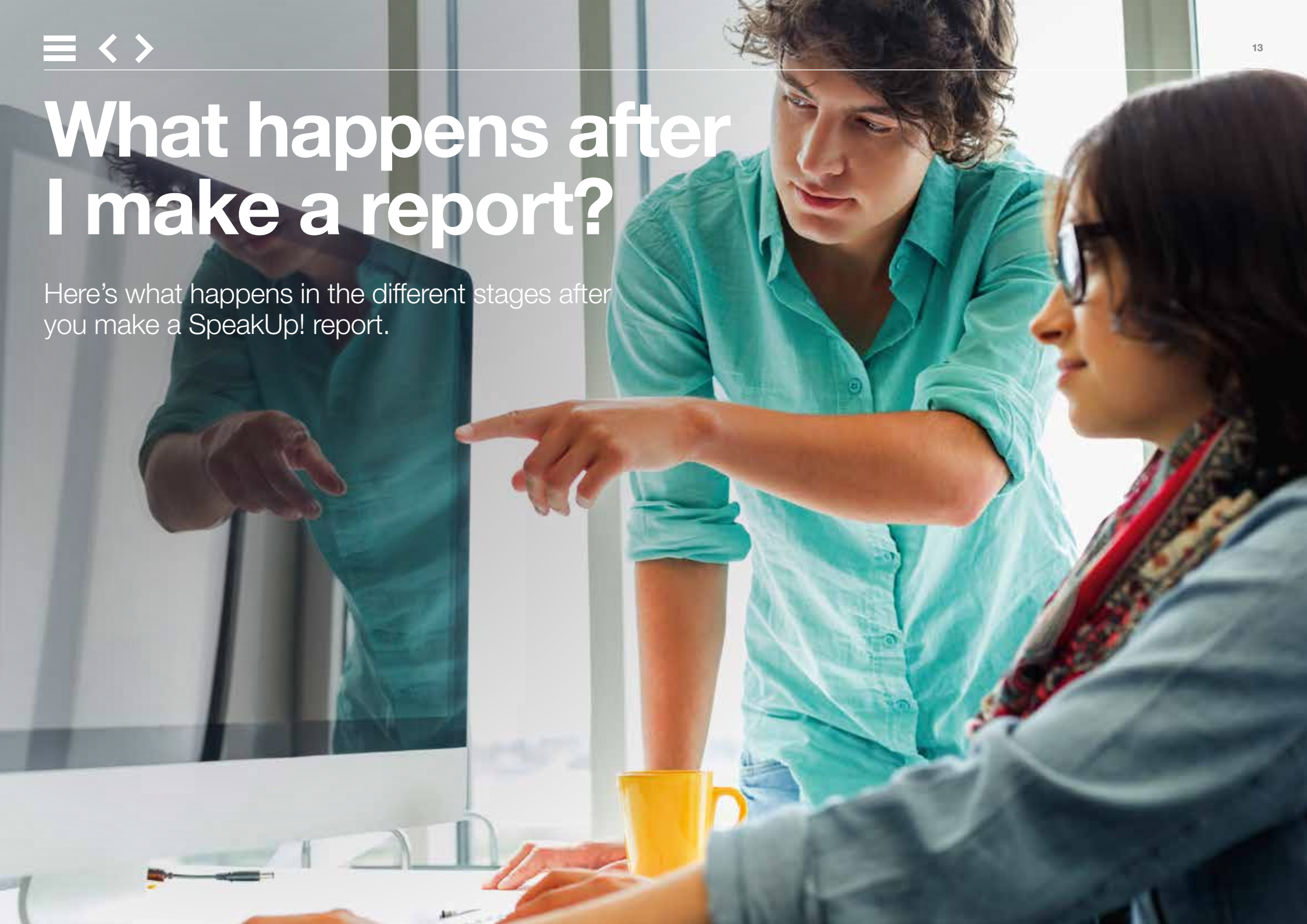
Anonymity

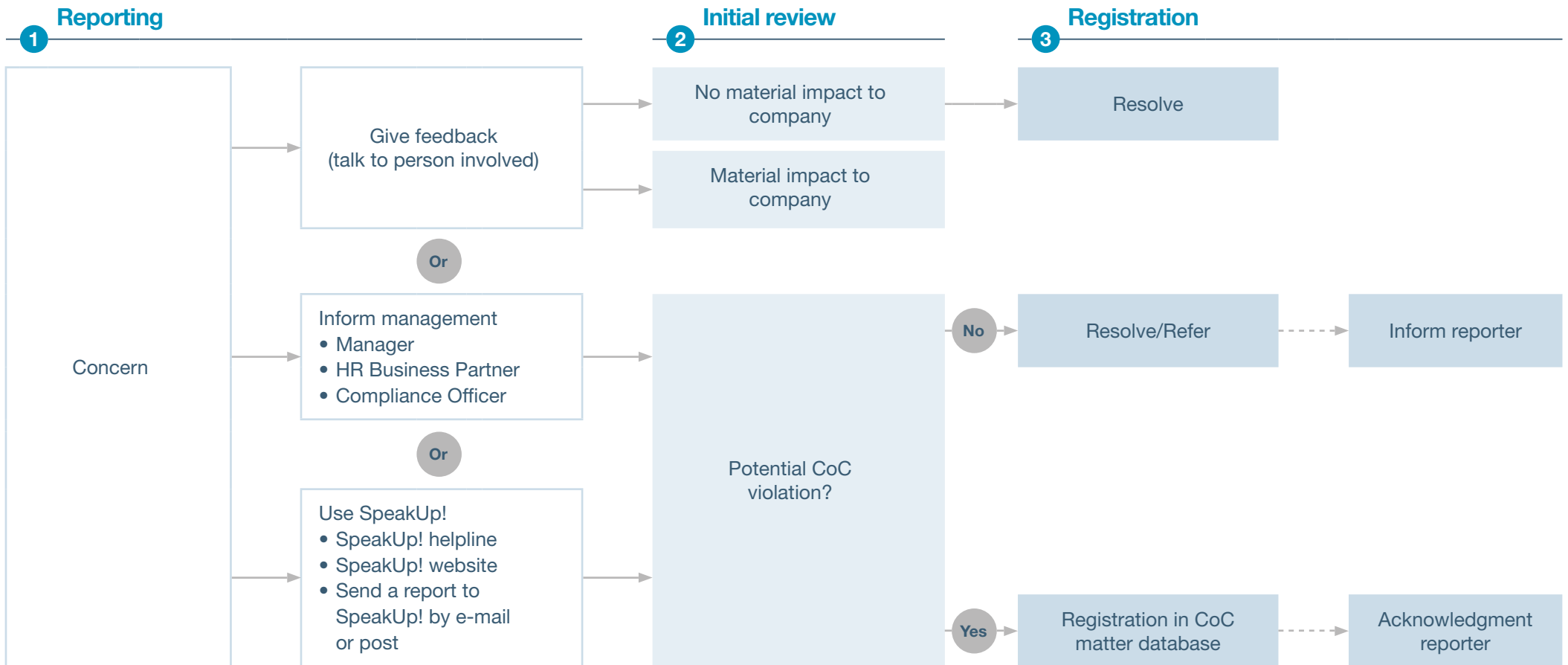
You're always encouraged to give your name and contact details when making a report. This makes the investigative process easier. But if you're uncomfortable identifying yourself, you can report your concern anonymously, to the extent allowed by local laws.

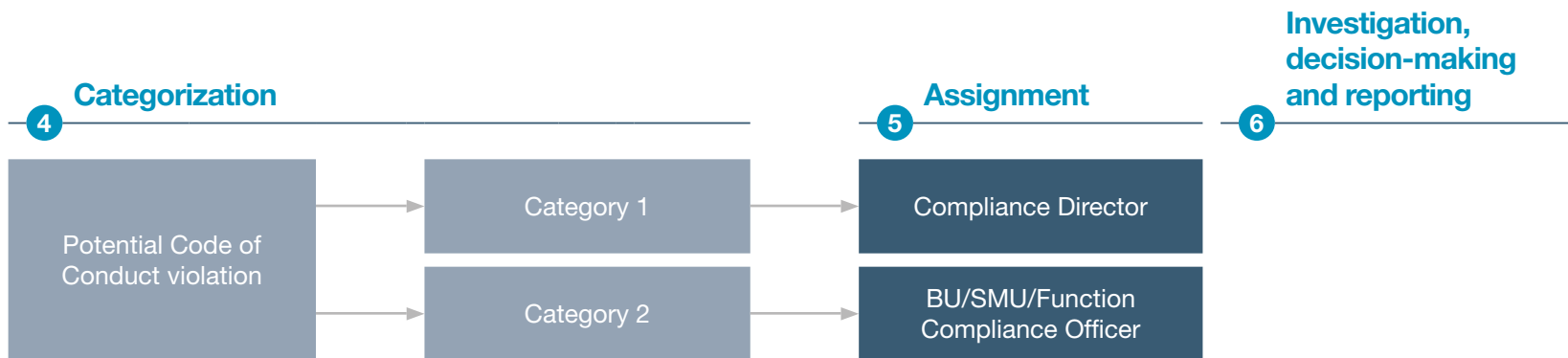
Sometimes, anonymous reports are harder to investigate, for instance if we do not have enough information or if we are unable to verify your report with you or develop an investigation plan.

What happens after I make a report?

Here's what happens in the different stages after you make a SpeakUp! report.







1 Reporting

If you'd made a report via the helpline or website

When you make a SpeakUp! report, either by phone or via the internet, you'll be asked to create a password and will be given a confidential report key number.

Don't forget to write these details down.

Your report key number is particularly important if you choose to remain anonymous, as we can only contact you through the EthicsPoint website in that case.

You can use this report key number and password to return to the [SpeakUp! helpline or website](#) at any point to check the status of your report or provide additional information.

The operator or system will generate a report. If you requested anonymity, the report won't contain your name. All reports received via the SpeakUp! helpline and website are then sent to ALG-Compliance for further action.

If you've sent an e-mail or letter

If you make a report by e-mailing speakup@akzonobel.com or writing a letter to the Director Compliance, it will go to ALG-Compliance for further action.

ALG-Compliance next steps

2 Initial review

ALG-Compliance will make an initial assessment whether the report was made in good faith and whether the concern is a potential Code of Conduct violation. They'll then decide on the type of investigation needed and who will be responsible for the investigation. You'll receive an acknowledgement of receipt within 8 working days.

If you've given us your name and address, and your report falls outside the scope of the SpeakUp! procedure we may return it, or let you know that we've referred it to the correct area. We may also get in touch if we need more information or substantiation.

If you filed the report anonymously, you should contact the SpeakUp! helpline or access the website 8 working days after you filed your report, to check if additional information is needed.

3 Registration

All SpeakUp! reports received through the helpline or website are registered in the central Code of Conduct matter database by Navex Global/EthicsPoint. Reports received by e-mail or letter are registered in the central Code of Conduct matter database by ALG-Compliance.

ALG-Compliance will also capture any potential Code of Conduct violations that they become aware of that have been raised by speaking to an individual, manager, HR Business Partner or Compliance Officer. Potential violations that come up in the ordinary course of business will also be captured. This might come up as part of an internal audit, for example. They'll be added to the database and will be investigated, but they won't be governed by guidance in this manual.

4 Categorization

Depending on the nature, urgency and potential impact of reports, ALG-Compliance will categorize them at their discretion as follows:

Category 1

- Potential Code of Conduct violations involving:
 - EUR 500,000 or more
 - A Supervisory Board, ExCo or BA/BU/SMU MT member or an ExCo direct report
 - Competition law, bribery and corruption or export control allegations

Category 2

- All other potential Code of Conduct violations

5 Assignment

As a general rule, Category 1 reports will be assigned to the Compliance Director and Category 2 reports will be assigned to the Compliance Officer of the relevant business or function. ALG-Compliance may involve itself in Category 2 matters if this is felt necessary or conducive to the investigation.

The Compliance Director or the business or functional Compliance Officer will be responsible for investigating the report. Everyone involved in investigating a concern is trained in our SpeakUp! rules and in how to carry out an investigation. Outside experts such as lawyers or accountants may be appointed by the Compliance Director or Compliance Officer to conduct or assist the investigation. This might be the case if specific expertise is needed, or if internal capacity isn't available. Depending on the nature of the matter reported, AkzoNobel may claim legal privilege.

6 Investigation, decision-making and reporting

Investigation

Investigations are focused on facts and aim to establish whether the allegations are correct and whether the Code of Conduct has been violated. They're conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles. Both the reporter and the person involved have the right to be heard during the investigations. People who become involved in an investigation are encouraged to cooperate and answer any questions completely and honestly. Delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures.

Decision-making

After the investigation of a Category 1 report has been concluded, the Corporate Compliance Committee will review the findings and decide whether the allegations made are substantiated, partially substantiated or unsubstantiated. If substantiated or partially substantiated it will decide on the appropriate sanctions and measures to take. The BU/SMU/Function Compliance Committee will decide on the outcome of Category 2 reports. Common sanctions include oral and written warnings, coaching, suspension and termination of employment or relationship. Other measures might include training and strengthening of procedures/controls.

Reporting

As appropriate, you and the person involved will be informed of the overall findings, for example whether or not we've found the reported Code of Conduct violation to be substantiated.

Once these steps have been completed, the matter will be tagged as 'closed' in the Code of Conduct matter database.

More information

Here you can find our contact details and links to more information.



Queries and concerns

If you have any queries relating to the Code of Conduct or SpeakUp!, please contact your manager, HR Business Partner or Compliance Officer in the first instance.

Alternatively, you can contact ALG-Compliance at compliance@akzonobel.com

We value feedback so we can improve the way concerns are handled. If you believe that your concern or a concern raised against you, hasn't been handled properly, please contact the Director Internal Audit. The Director Internal Audit will give you a decision about the submitted complaint and any action taken as a result.

Links to more information

[Code of Conduct](#)
[Directive 7.11 Code of Conduct violations](#)
[Rules 7.11.1 Code of Conduct violations](#)
[SpeakUp! portal \(internal\)](#)
[SpeakUp! website \(external\)](#)
[Directives Portal](#)

Personal data protection

Who is responsible for the data?

Akzo Nobel N.V., and the AkzoNobel affiliate responsible for the investigation, is the data controller for the processing of personal data in the context of SpeakUp! Akzo Nobel N.V. and, where required, affiliates have notified the processing of personal data to the national data protection authorities.

For what purpose is personal data processed?

Personal data is processed for the purpose of handling and investigating SpeakUp! reports.

What does the purpose entail?

AkzoNobel processes personal data when it handles reports about Code of Conduct violations.

Which personal data is processed?

The data processed is limited to the name, position and contact details of the reporter, the person involved and all persons participating in the investigation and handling of the report, the reported facts, the information gathered during the investigation, the results of the investigation and the actions that will be taken following the investigation.

How long is the personal data stored?

Personal data relating to reports that have been found unsubstantiated shall be deleted as soon as possible. Personal data relating to reports that have been found substantiated will be deleted within eight (8) weeks after the verification work is completed. If disciplinary measures are taken or court proceedings are filed against the person involved or the reporter, the data will be deleted within eight (8) weeks after the disciplinary measures or completion of the court proceedings (in highest instance).

After these storage periods have ended, certain personal data are kept for historic reference, learning, statistics and reporting. This includes region, BU/SMU/BA/Function, description of the incident, issue type, results of the investigation and actions taken. Direct personally identifiable data is removed. This aggregated personal data is deleted after one year except, if the data is needed to fulfill legal, notary or fiscal obligations.

Who has access to the data?

Only those persons within AkzoNobel who need to know the information to execute their tasks under SpeakUp! have access to personal data relating to the report. AkzoNobel involved an agency that operates the external SpeakUp! helpline and website. In so far this agency has access to personal data, AkzoNobel has taken the necessary contractual and organizational measures to ensure that the data are only processed to the extent necessary to perform the services. Personal data will not be supplied to other parties, except when required by law.

If it is necessary to transfer personal data to a person or legal entity in a country outside the European Economic Area that does not provide for an adequate level of protection, AkzoNobel will adhere to requirements under applicable law and arrange for suitable safeguards to enable this transfer.

How is the data secured?

AkzoNobel and the agency that operates the external SpeakUp! helpline and website have taken adequate safeguards to ensure the confidentiality and security of the personal data. Such measures include authentication processes and other means necessary to protect the reporting employee's identity. Also, personal data relating to SpeakUp! will be processed separately from other employee/HR information. All persons participating in the investigation and handling of the report shall be bound by confidentiality obligations.

Right to access, edit and removal?

Any employee may request its manager, Compliance Officer or the Compliance function whether or not a report has been filed involving him or her. If so, the employee will be provided with a written overview of the personal data available about him unless this would seriously hinder the investigation. If the personal data proves to be incorrect or irrelevant, the person involved can request correction or removal of the data. In addition, the person involved has a right to object to the processing of personal data on the basis of compelling legitimate grounds relating to his particular situation. Replies to a request for access, correction or removal shall be provided in writing as soon as reasonably possible, but no later than four (4) weeks. Any refusal shall set out the reason therefore.



www.akzonobel.com

AkzoNobel is a leading global paints and coatings company and a major producer of specialty chemicals. Calling on centuries of expertise, we supply industries and consumers worldwide with innovative products and sustainable technologies designed to meet the growing demands of our fast-changing planet. Headquartered in Amsterdam, the Netherlands, we have approximately 46,000 people in around 80 countries, while our portfolio includes well-known brands such as Dulux, Sikkens, International, Interpon and Eka. Consistently ranked as one of the leaders in the area of sustainability, we are committed to making life more liveable and our cities more human.

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