



## **WHISTLEBLOWER POLICY**

Effective Date: 08/26/2019

### **I. SCOPE**

This policy pertains to all employees.

### **II. PURPOSE**

#### **Make a Difference – Preserve Our Culture of Integrity**

Alter is committed to ethical and legal conduct. Maintaining high standards protects the reputation the Company has built since its beginning over 100 years ago. Business conduct violations can result in serious consequences for both individuals and the organization. We need your help to ensure that our work environment is safe and productive and our assets and relationships are protected.

### **III. POLICY**

#### **Speak Up!**

We encourage and expect our employees, customers and other 3<sup>rd</sup> parties with whom we do business to report concerns about unethical, illegal or irresponsible activity. If you witness or suspect such activity, don't ignore it – let us know. Your report could be critical in helping the organization avoid a potentially harmful situation.

Examples of the types of issues that should be reported include:

- Theft or fraud
- Misuse of company funds or other assets
- Improper dealings with customers or vendors
- Kickbacks or bribes
- Accounting or auditing irregularities
- Falsification of company records
- Customer relations issues
- Discrimination, harassment, retaliation, substance abuse or threats of violence
- Disclosure of proprietary or confidential information
- Conflicts of interest
- Safety and sanitation issues
- Employee relations issues

Violations of these types are taken seriously and may result in disciplinary action, up to and including termination of employment or business relationships, as well as civil and criminal penalties.

## **What to Do if You Have a Concern**

### ***Talk to Your Supervisor***

Employees may report incidents of suspected misconduct to their direct supervisor, facility leader, General Counsel or to any member of the Alter leadership team with whom they are comfortable. Alter leaders who receive this type of report should immediately contact Internal Audit to initiate an investigation. Human Resource or Safety issues will be passed to the appropriate functional leader to address as needed.

### ***Make an Anonymous Report***

If you prefer to remain anonymous, you may contact NAVEX EthicsPoint, an independent reporting service that allows you to communicate your concerns anonymously and confidentially via the Company's website, the Alter intranet, or by phone to a professional interview specialist.

**NAVEX EthicsPoint      1-877-722-8798      [www.altertrading.ethicspoint.com](http://www.altertrading.ethicspoint.com)**

Reports submitted to NAVEX EthicsPoint are handled promptly and discretely by the Company's Internal Audit, Human Resources, and Legal departments to determine the best course of action. The extent and type of investigation will vary based upon the individual circumstances of each report. In all cases, confidentiality will be maintained to the highest degree possible.

### ***Customers, Suppliers & Business Partners with Concerns***

Alter's business partners may report concerns directly to an Alter leader or Internal Audit, or may contact NAVEX EthicsPoint by phone or using the link on our website. We value our business partners and will act on reported concerns from 3<sup>rd</sup> parties in the same manner as those received from our employees.

### **Retaliation is Not Tolerated!**

Whistleblower reports should be made in good faith and regardless of the identity and position of the suspected offender. Alter does not tolerate retaliation against any person making a good faith report regarding a suspected violation, or who assists in performance of an investigation related to a potential violation.

### **Investigations**

Investigations are the responsibility of Internal Audit and should not be undertaken by individual locations or functions. Internal Audit will form the investigative team, which may include the General Counsel, representatives of Human Resources and/or Operations or other functions as needed.

The investigative team will accumulate and analyze evidence, and may conduct interviews. All persons involved in an internal investigation are obligated to cooperate, be truthful, and provide relevant information and evidence. Participants are required to keep investigative information confidential.

Given the Company's no retaliation policy, employees and 3<sup>rd</sup> parties are encouraged to provide their name and contact information when making a report so that the investigative team may work with them directly to obtain details relevant to the investigation. Confidentiality will always be maintained to the extent possible.