

Annex 1 – Privacy Notice

Dear all,

Thank you for your support. Here at the **Mondi Group** (“**We**”, “**Our**” or “**Mondi**”), We are committed to ethical business practice and conduct. Acting with integrity is one of Mondi’s core values. To support this, we use “**SpeakOut**”, an alternative, free and confidential service for every colleague, customer and partner who have experienced behavior that is not in line with our company values or ethical views.

It is important to us that we give you the confidence to use SpeakOut. Please be assured that all concerns raised will be treated seriously and in the strictest confidence. Any person raising an issue or concern will not be discriminated against in any way.

This Privacy Notice (“**SpeakOut Privacy Notice**”) provides you with information on how We will process your personal data in connection with Our reporting system SpeakOut in accordance with the legal requirements under Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (“**EU Directive**”), the local laws of member states implementing the EU Directive (“**local transpositions of the EU Directive**”) (“and the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“**General Data Protection Regulation**” – “**GDPR**”). Mondi AG, Marxergasse 4A, 1030 Vienna (“**Mondi AG**”) will be the data controller for the processing of your personal data in relation to the reporting system.

1. Reporting System SpeakOut

Mondi has implemented the reporting system SpeakOut (see [here](#)) for the reporting of incidents affecting our “**Five Mondi Principles**” as established in our Code of Business Ethics:

- (i) Legal Compliance: Mondi will comply with all applicable laws and regulations;
- (ii) Honesty and Integrity: Mondi will observe the highest standards of honesty and integrity;
- (iii) Human Rights: Mondi will respect internationally proclaimed human rights, and act in accordance with internationally declared standards;
- (iv) Stakeholders: Mondi will have due regards to the interests of all its stakeholders, including shareholders, employees, customers, business partners and communities; and
- (v) Sustainability: Mondi will conduct its business sustainably, producing sustainable solutions that contribute to a circular economy, while ensuring safety, health and the protection of the environment.

The SpeakOut system is provided by an independent third party, People Intouch B.V. (“**People Intouch**”, [Privacy Policy](#)). The overall process is coordinated by the Group Internal Audit.

It is up to you how you would like to make your report via SpeakOut - you can choose to either make a report in written form online or in spoken word via phone line / voice message in the mobile application. If you choose to make a report via phone line, People Intouch will transcribe your message and then erase the “spoken” version. This way no one at Mondi will hear your voice.

People Intouch will send the report to Our Response Team, consisting of Group Internal Audit team members (“Response Team”) and, by case, independent senior managers employed at the Mondy Group entities listed in Annex 3. The Response Team will review the report and follow up, usually within one week. You can also always follow up on your report by using the phone number/web link and inserting Mondy’s unique access code 108384.

Investigations of any reports are carried out by the Mondy Response Team with the entities listed in Annex 3, acting as joint controllers. Pursuant to the joint controller agreement concluded between these entities, Mondy AG is the primary contact point for any data subject requests.

2. Processed data categories

Giving you the confidence to use SpeakOut is important to us, so you are not required to identify yourself in any SpeakOut message or to provide any other personal data in the course of a report in SpeakOut. However, if you do not provide your personal data, the affected reporting processes might be delayed or impossible. Should the provision of your personal data be mandatory by law, We will inform you separately thereof.

We process certain personal data about you that you or others provide to us when using SpeakOut. In addition, we may also collect personal information that we receive from individuals named in a report, as well as personal information that is publicly available if it is related to a report in our reporting system. The personal data categories that We may process under the applicable laws of your jurisdiction are listed in Annex 2 (“**Personal Data**”).

We do not use automated individual decision-making that would produce legal effects for you or would similarly significantly affect you.

3. Purposes for which We process your data

We process the categories of your personal data set out in the Annex 2 for the following purposes:

- securely and confidentially receiving, processing and managing reports regarding violations of the Five Mondy Principles;
- fulfilling recording, information and reporting obligations and otherwise complying with legal requirements that apply to Mondy as well as complying with internal Guidelines;
- to protect individuals who make reports and those around them from personal disadvantages and unfounded or unjustified suspicions;
- responding to inquiries from the state authorities, offices, institutions and agencies, pursuant to applicable legal regulations (e.g. courts, bailiffs, tax authorities, police etc.).

4. Legal bases of the processing

We process the categories of your personal data set out in the Annex 2 on the legal bases under the GDPR as follows:

- To the extent that the processing is within the scope of the local transpositions of the EU Directive, we process personal data to comply with our obligations pursuant to the local transpositions of the EU Directive and other relevant laws, regulatory requirements and to respond to lawful requests, court orders, and legal proceedings (pursuant to Art. 6(1)(c) GDPR in conjunction with the respective rules under the local transpositions of the EU Directive; in the case of special categories of personal data pursuant to Art. 9(2)(g) GDPR in conjunction with the respective rules under the local transpositions of the EU Directive; in the case of personal data relating to criminal convictions or criminal offences pursuant to Art. 10 GDPR in conjunction with the respective rules under the local transpositions of the EU Directive).
- To the extent that the processing is outside the scope of the respective rules under the local transpositions of the EU Directive, we process personal data to pursue our overriding legitimate interest which may lie in (i) conducting investigations and taking appropriate measures with regard to potential, past, present or future violations of applicable law, (ii) complying with laws and other compliance requirements, (iii) ensuring smooth business operations, and (iv) recording and preventing misconduct and thereby averting damage to our employees, business partners or third parties (pursuant to Art. 6(1)(f) GDPR); in the case of personal data relating to criminal convictions or criminal offenses pursuant to Art. 10 GDPR in conjunction with and to the extent that it is permitted under respective national laws of member states) or in the case of special categories of personal data for the purpose of asserting, exercising or defending legal claims or if processing is necessary for reasons of substantial public interest (pursuant to Art. 9(2)(f) and (g) GDPR).

5. Transfer of your personal data

To achieve the purposes set out above, we may transfer your personal data to the following categories of recipients:

- members of the Mondri Response Team;
- management and supervisors of other Mondri Group companies whose employees are involved in reported matter (e.g., management and supervisors of the parent company or affiliated companies);
- any entity of the Mondri Group that is involved in any investigations with regard to the reporting system;
- service providers that we use in the course of the processing and managing of the report (People Intouch B.V and e.g., law firms, certified public accountants, or IT service providers);
- competent public authorities and courts (e.g., tax authorities, security authorities).

Some of the recipients referred to above are located in or process personal data outside of your country. The level of data protection in another country may not be equivalent to that in your country. However, We only transfer your personal data to countries where the EU Commission has decided that they have an adequate level of data protection or We take appropriate measures to ensure that all recipients provide an adequate level of data protection. We do this for example by entering into appropriate data transfer agreements based on Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914) and at the same time applying additional safeguards to ensure the adequate level of data protection. The Standard Contractual Clauses are accessible upon request (for the contact details see below).

6. Retention period

Personal data collected as a result of a report will be kept only as long as necessary and for the purpose for which it has been collected in compliance with applicable law. Reports within the scope of application of the local transpositions of the EU Directive are kept for at least 5 years after their last processing or transmission, and beyond that as long as it is necessary for the execution of initiated judicial, administrative, or prosecutorial proceedings.

7. Your rights in connection with your personal data

Under applicable law, you have the right to (under the conditions set out in applicable law):

- obtain confirmation as to whether and what kind of personal data We collect, process and store about you and to request copies of such data;
- request rectification or erasure of your personal data;
- request us to restrict the processing of your personal data;
- object to the processing of your personal data;
- withdraw any consent previously granted for the processing (withdrawing your consent does not affect the lawfulness of processing based on your consent before your withdrawal); and
- request data portability;
- to lodge a complaint with the competent supervisory authority.

These rights may be restricted in accordance with applicable law in individual cases, in particular if this is necessary to protect the identity of a reporter or persons supporting the reporter, or if a restriction of these rights is necessary to fulfill the purpose of a reporting pursuant to the local transpositions of the EU Directive in conjunction with Art. 23(1)(e) and (i) GDPR).

8. Contact Details

The reporting system SpeakOut implemented by Mondi is provided by People Intouch ([Privacy Policy](#)). Mondi is the controller of the data processed in connection with SpeakOut.

Please address your requests or questions concerning the processing of your personal data to:

- a. You can find the contact details of each entity here: <https://www.mondigroup.com/en/about-mondi/where-we-operate/our-locations/>
- b. Alternatively contact the Group Head of Internal Audit, Mr. Pedro Morais, pedro.morais@mondigroup.com;
- c. Alternatively, please use the “[contact us form](#)”.

Last updated on 15 March 2024.

Annex 2 – Categories of Personal Data

The following categories of Personal Data shall only be collected, processed and maintained in the manner and for the purposes described above to the extent legitimate and permissible under local laws. Categories of Personal Data identified with an asterisk* are in principle not collected/processed with respect to employees in Belgium.

I. Identity, function and contact details of the

- reporter;
- persons subject to the reporting; and
- persons involved in the processing of the facts reported.

This information includes, but is not limited to, the following data:

- name (first name, middle name, last name and maiden name);
- prefix (Mr. /Mrs. /etc.) including academic titles (if provided);
- gender;
- suffix;
- date of birth;
- address;
- telephone and mobile phone number;
- email address;
- tax ID;
- nationality or citizenship;
- other information necessary for addressing based on modern communications technology.

II. Company and workplace data

This information includes, but is not limited to, the following data:

- company name;
- department / division;
- company address;
- employee ID or personnel number;
- workplace contact information (e.g. work e-mail address, work phone no.);
- job title, occupational function and position;
- organizational assignment within the company;
- supervisor, manager or reporting lines;
- scope of representational authority.

III. General contract and employment information

This information includes, but is not limited to, the following data:

- information regarding contract (e.g., temporary / limited contract, employment start and/or end date);
- employment status (e.g., active, on leave, terminated);
- employee attendance data (e.g., time records, paid time off, leaves, absences, time in lieu);
- (non)-IT company assets assigned (e.g., company car, laptop);
- Information regarding hiring process (e.g. previous work history, references);
- reason for employment action (e.g., hire/termination);
- Payroll, compensation and benefits information (e.g. salary, overtime compensation, bonus compensation, travel allowances).

IV. Information collected in connection with the report and the investigation of the reported facts

This information includes, but is not limited to, the following data:

- business cases, legal cases and contracts handled by the reporting person;
- questions the reporting person has asked;
- contracts and contract documents the reporting person has signed;
- customs registrations;
- role in compliance-relevant issues;
- accepted or declined invitations or gifts;
- payments or donations made;
- payment receipts;
- conflicts of interests;
- travel and visit information;
- events;
- where the incident occurred (e.g. country, company);
- when the incident occurred (e.g. date and time);
- frequency of the incident (e.g. one-time event, regularly behaviour);
- impacted companies / divisions / departments;
- evidence in relation to the incident (e.g. witness);
- process history and measures taken;
- investigation report and consequences of the reporting;
- images, videos and audio / recordings of call;
- IT-related information (e.g., IP address, log files, credentials);
- other personal data shared by the reporting person.

Annex 3 – Mondi Group entities

Investigations of any reports are carried out by the Mondi Response Team with the entities listed below acting as joint controllers:

Crt.	Entity Name	Category
1	Caja de Ahorro de Personal de Mondi Mexico Servicios A.C.	Subsidiary
2	Dipeco AG	Subsidiary
3	Dogal Kagit Hammaddeleri Sanayi Ve Ticaret Limited Sirketi	Subsidiary
4	East Paper, spol. s.r.o.	Joint Venture
5	Ensachage Moderne Sarl	Subsidiary
6	EURO WASTE s.r.o.	Subsidiary
7	Frantschach Holdings UK Limited	Subsidiary
8	Harvestia Oy	Subsidiary
9	Jordan Paper Sacks Co. Ltd.	Subsidiary
10	Labe Wood s.r.o.	Joint Venture
11	Medway Packaging Pension Trustee Limited	Subsidiary
12	Mondi Aberdeen Limited	Subsidiary
13	Mondi AG	Subsidiary
14	Mondi Bad Rappenau GmbH	Subsidiary
15	Mondi Bags Hungaria Kft.	Subsidiary
16	Mondi Bags Iberica S.L.U.	Subsidiary
17	Mondi Bags Mielec Sp. z o.o.	Subsidiary
18	Mondi Bags Steti a.s.	Subsidiary
19	Mondi Bags Swiecie Sp. z o.o.	Subsidiary
20	Mondi Bags UK (Holdings) Ltd.	Subsidiary
21	Mondi Bags UK Ltd.	Subsidiary
22	Mondi Bags USA, LLC	Subsidiary
23	Mondi Bangkok Company, Limited	Subsidiary
24	Mondi Békéscsaba Kft	Subsidiary
25	Mondi Bucharest S.R.L.	Subsidiary
26	Mondi Bupak s.r.o.	Subsidiary
27	Mondi BZWP Sp. z o.o.	Subsidiary

Crt.	Entity Name	Category
28	Mondi Cairo for Packaging Material S.A.E.	Subsidiary
29	Mondi Cartagena SAS	Subsidiary
30	Mondi Coating (Thailand) Co. Ltd.	Subsidiary
31	Mondi Coating B.V.	Subsidiary
32	Mondi Coating Steti a.s.	Subsidiary
33	Mondi Coating Zeltweg GmbH	Subsidiary
34	Mondi Consumer Bags & Films B.V.	Subsidiary
35	Mondi Consumer Bags & Films Benelux B.V.	Subsidiary
36	Mondi Consumer Goods Packaging UK Ltd	Subsidiary
37	Mondi Consumer Packaging GmbH	Subsidiary
38	Mondi Consumer Packaging International GmbH	Subsidiary
39	Mondi Corrugated B.V.	Subsidiary
40	Mondi Corrugated Holding Österreich GmbH	Subsidiary
41	Mondi Corrugated Poland B.V.	Subsidiary
42	Mondi Corrugated Services GmbH	Subsidiary
43	Mondi Corrugated Swiecie Sp z o.o.	Subsidiary
44	Mondi Dorohusk Sp. z o.o.	Subsidiary
45	Mondi Duino S.r.l.	Subsidiary
46	Mondi Dynäs AB	Subsidiary
47	Mondi Engineered Materials GmbH	Subsidiary
48	Mondi Eschenbach GmbH	Subsidiary
49	Mondi Estonteco GmbH	Subsidiary
50	Mondi Finance Europe GmbH	Subsidiary
51	Mondi Finance plc	Subsidiary
52	Mondi Finland Services Oy	Subsidiary
53	Mondi FlexPack Trading GmbH	Subsidiary
54	Mondi Frantschach GmbH	Subsidiary
55	Mondi Gournay Sarl	Subsidiary

Crt.	Entity Name	Category
56	Mondi Gradisac S.r.l.	Subsidiary
57	Mondi Grünburg GmbH	Subsidiary
58	Mondi Halle GmbH	Subsidiary
59	Mondi Hammelburg GmbH	Subsidiary
60	Mondi Heerlen B.V.	Subsidiary
61	Mondi Hinton Inc.	Subsidiary
62	Mondi Holcombe Limited	Subsidiary
63	Mondi Holding Deutschland GmbH	Subsidiary
64	Mondi Holdings Austria GmbH	Subsidiary
65	Mondi Ibersac S.L.U.	Subsidiary
66	Mondi Industrial Bags B.V.	Subsidiary
67	Mondi Industrial Bags GmbH	Subsidiary
68	Mondi Inncoat GmbH	Subsidiary
69	Mondi International Holdings B.V.	Subsidiary
70	Mondi Investments Limited	Subsidiary
71	Mondi Istanbul Ambalaj Limited Sirketi	Subsidiary
72	Mondi Italia S.r.l.	Subsidiary
73	Mondi Jackson LLC	Subsidiary
74	Mondi Jülich GmbH	Subsidiary
75	Mondi Kale Nobel Ambalaj Sanayi Ve Ticaret Anonim Sirketi	Subsidiary
76	Mondi Kaso Iraq Industrial Bags Ltd.	Subsidiary
77	Mondi Korneuburg GmbH	Subsidiary
78	Mondi Krapkowice Sp. z o.o.	Subsidiary
79	Mondi KSP Co., Ltd.	Subsidiary
80	Mondi Kuala Lumpur Sdn. Bhd.	Subsidiary
81	Mondi Lebanon SAL	Subsidiary
82	Mondi Lembacel SAS	Subsidiary
83	Mondi Maastricht N.V.	Subsidiary
84	Mondi MENA B.V.	Subsidiary
85	Mondi Mexico S. de R.L. de C.V.	Subsidiary
86	Mondi Minneapolis, Inc.	Subsidiary

Crt.	Entity Name	Category
87	Mondi Moss AS	Subsidiary
88	Mondi Neusiedler GmbH & Co KG	Subsidiary
89	Mondi Neusiedler Verwaltungs GmbH	Subsidiary
90	Mondi Oman Holding GmbH	Subsidiary
91	Mondi Oman LLC	Subsidiary
92	Mondi Örebro AB	Subsidiary
93	Mondi Packaging (Delta) Limited	Subsidiary
94	Mondi Packaging Bags Ukraine LLC	Subsidiary
95	Mondi Packaging Limited	Subsidiary
96	Mondi Packaging Paper B.V.	Subsidiary
97	Mondi Packaging Paper Sales Asia Pte. Ltd.	Subsidiary
98	Mondi Packaging S.a.r.l.	Subsidiary
99	Mondi Packaging UK Holdings Limited	Subsidiary
100	Mondi Padova S.r.l.	Subsidiary
101	Mondi Paper Sack Zeltweg GmbH	Subsidiary
102	Mondi Paper Sales Deutschland GmbH	Subsidiary
103	Mondi Paper Sales France Sarl	Subsidiary
104	Mondi Paper Sales GmbH	Subsidiary
105	Mondi Paper Sales Italia S.R.L.	Subsidiary
106	Mondi Paper Sales Netherlands B.V.	Subsidiary
107	Mondi PLC	Parent
108	Mondi Poperinge N.V.	Subsidiary
109	Mondi Powerflute Oy	Subsidiary
110	Mondi Poznan Sp. z o.o.	Subsidiary
111	Mondi Release Liner Austria GmbH	Subsidiary
112	Mondi Romeoville LLC	Subsidiary
113	Mondi S.a.r.l.	Subsidiary
114	Mondi Sahel Holdings (Pty) Ltd	Subsidiary
115	Mondi Sales Iberica S.L.	Subsidiary
116	Mondi SCP Holdings B.V.	Subsidiary
117	Mondi SCP, a.s.	Subsidiary

Crt.	Entity Name	Category
118	Mondi Scunthorpe Limited	Subsidiary
119	Mondi Sendenhorst GmbH	Subsidiary
120	Mondi Senegal S.A.	Subsidiary
121	Mondi Services (UK) Limited	Subsidiary
122	Mondi Services S.a r.l.	Subsidiary
123	Mondi Silicart S.r.l.	Subsidiary
124	Mondi Solec Sp. z o.o.	Subsidiary
125	Mondi South Africa (Pty) Limited	Subsidiary
126	Mondi Stambolijski EAD	Subsidiary
127	Mondi Steti a.s.	Subsidiary
128	Mondi Steti White Paper s.r.o.	Subsidiary
129	Mondi Styria GmbH	Subsidiary
130	Mondi Swiecie S.A.	Subsidiary
131	Mondi Szada Kft.	Subsidiary
132	Mondi Szczecin Sp. z o.o.	Subsidiary
133	Mondi Tanger S.A.	Subsidiary
134	Mondi Tekkote LLC	Subsidiary
135	Mondi Thessaloniki A.E.	Subsidiary
136	Mondi Tokyo KK	Subsidiary
137	Mondi Tolentino S.r.l.	Subsidiary
138	Mondi Trebsen GmbH	Subsidiary

Crt.	Entity Name	Category
139	Mondi TSP Company Limited	Subsidiary
140	Mondi Turkey Oluklu Mukavva Kağıt ve Ambalaj Sanayi Anonim Şirketi	Subsidiary
141	Mondi U.S. Holdings LLC	Subsidiary
142	Mondi Uncoated Fine & Kraft Paper GmbH	Subsidiary
143	Mondi Warszawa Sp. z o.o.	Subsidiary
144	Mondi Wellpappe Ansbach GmbH	Subsidiary
145	Mondi Wierzbica Sp. z o.o.	Subsidiary
146	NATRO TECH S.r.l.	Subsidiary
147	Obaly SOLO, s.r.o.	Subsidiary
148	Pap Sac Maghreb SA	Subsidiary
149	PLWD Sp. z o.o.	Joint Venture
150	Powerflute Group Holdings Limited	Subsidiary
151	Powerflute Italia S.r.l. in liquidazione	Subsidiary
152	RECOPAP, s.r.o.	Joint Venture
153	Slovpaper Collection s.r.o.	Subsidiary
154	Slovpaper Recycling s.r.o.	Subsidiary
155	SLOWOOD Ruzomberok a.s.	Subsidiary
156	STRAZNA SLUZBA VLA-STA s. r. o.	Subsidiary
157	Suez Bags Company (S.A.E.)	Subsidiary