

Whistleblower Policy

1.1. Objective of This Policy

We are committed to promoting and supporting a culture that encourages employees to speak up when they encounter behavior at the workplace that is unethical or illegal, or violates the values of our code of conduct.

Whistleblowers are an important source of information for uncovering unlawful or unethical behavior that needs to be corrected, and the company is dedicated to protecting whistleblowers from disadvantages, retaliation, and discrimination.

This policy is designed to provide clarity on how the company supports whistleblowers, ensuring that you:

- are encouraged to express your concerns;
- know how to voice your concerns;
- understand what happens when you voice your concerns, and
- feel safe and protected when expressing your concerns

This policy is available in its most current version on the intranet and on the website.

1.2. Who Can Report?

Reports can be made by current or former employees, executives, board members, senior staff, suppliers and service providers, interns, and other business partners. This also applies to relatives, dependents, or spouses of these individuals.

1.3. What Can Be Reported?

A condition for reporting is that the reporting person reasonably believes that the disclosure indicates past, present, or likely future misconduct that properly falls into one or more of the following categories:

- Theft, embezzlement, and misappropriation, fraud
- Bribery and corruption
- Violations of competition and antitrust laws
- Discrimination and harassment
- Conflicts of interest
- Product safety
- Violations in the area of environment, health, and safety
- Violation of human rights
- Insider trading
- Data protection and information security
- Sanctions violations
- Violations of the company's code of conduct

The whistleblower system is not designed for resolving general complaints. For personal employment-related issues, employees can contact the HR department. Customers can address complaints to customer service.

2. How Whistleblowers Can Make Reports

2.1. Internal Reporting Channels

The company has established a whistleblower portal. Reports can be made via this portal.

Whistleblowers can also discuss their concerns internally directly with their supervisor or a contact person.

2.1.1. Trusted Person

The trusted person serves as an independent entity and recipient of incoming reports between the whistleblower and the company on our portal.

Reports can be made there at any time, 24 hours a day, in various languages via a secured system. The reporting process is encrypted and password-protected. You receive a unique reference and create your own PIN to check the status of the processing. Communication with the whistleblower takes place on this secured platform.

Reports can also be submitted by mail or, by arrangement, in the context of a personal meeting.

2.1.2. Anonymity

When you make a report, you can do so anonymously. You remain anonymous throughout the investigation and after its conclusion.

If you submit an anonymous tip via the whistleblower portal, you will receive a unique reference. You can then log into the whistleblower portal to provide further information or request an update.

2.1.3. Reporting Requirements

A condition for reporting is that the reporting person reasonably believes that the disclosure indicates past, present, or likely future misconduct.

A whistleblower acts in good faith if he believes that the information is comprehensive and correct, even if the suspicion of a violation is not confirmed and information is refuted during the investigation.

All reports should be as objective and complete as possible. Although consultations with the whistleblower are held during case processing, mere suspicions should be avoided. Whistleblowers can use the following questions as a guide for the reporting process:

- What happened?
- When did it happen?
- Who was or is involved?
- Are the circumstances continuing?
- How high is the risk and how time-critical is the violation being reported?
- Who has knowledge of this violation?
- Documents that can help clarify the report should be provided when reporting violations.

2.2. External Reporting Channels

Whistleblowers are free to report a legal violation to government authorities. However, we encourage whistleblowers to first make reports through internal channels. This ensures that misconduct can be addressed as quickly as possible and further damage can be prevented.

3. What Happens After Submitting a Report

3.1. Acknowledgment of Receipt

Within seven days, whistleblowers will receive confirmation of the receipt of their report. If you have submitted a tip anonymously, you will find the confirmation as well as all questions and feedback regarding your tip in the whistleblower portal.

3.2. Examination

The trusted person first checks all reports to see if they fall within the scope of this policy. If it is a report according to this policy, the company appoints an investigation officer. The investigation officer can be an employee or an external service provider. The type and extent of investigation methods vary depending on the nature of the reported violation and may require the involvement of experts.

An investigation officer is then determined based on whether he is qualified to conduct the investigation in a timely, professional, objective, fair, and independent manner. The processing of reports is carried out in accordance with applicable laws.

3.3. Conclusion of the Examination

The type of corrective measures to prevent future violations is developed case-dependently with the respective relevant departments. The results of the investigation are directly transmitted to the executive management and, if applicable, the supervisory board.

In accordance with the EU Directive, the whistleblower is informed within 3 months (in exceptional cases within 6 months) about the results of the investigation and the measures taken via the whistleblower portal.

4. Protection for Whistleblowers

The company ensures protection and measures that allow whistleblowers to report violations confidentially and without fear of intimidation, disadvantage, or reprisals. Disadvantages in this sense are direct and indirect actions or omissions that may be related to the reporting of a violation.

Any person who takes retaliatory actions against a whistleblower for reporting a violation or participating in an investigation will face employment law consequences and disciplinary actions up to and including termination of employment.

4.1. Confidentiality

As the most important measure to protect the identity of the whistleblower, access to the whistleblower portal and the processing of reports is restricted to a strictly limited group of people, so that only those involved in the report have knowledge of the whistleblower's identity and the content of the report, provided the whistleblower discloses his identity.

The identity of the whistleblower remains secret at all steps of processing reports and may only be disclosed with the express consent of the whistleblower, unless disclosure is legally required. Here, the whistleblower will be informed beforehand.

4.2. Protection of Affected Persons

The rights of the persons referred to in reports within the whistleblower system are governed by relevant data protection laws. The persons affected by a report are informed as soon as possible about the received report and are made aware of their duty to provide information and their right to rectification. However, if there is a significant risk that the notification could jeopardize an internal investigation, the notification can be postponed until the investigation is completed or the corresponding risk no longer exists. The affected persons have the right to access data concerning their own person and can request changes.

4.3. Data Protection

Information within the context of incoming reports and subsequent processing is processed in accordance with the requirements of the European General Data Protection Regulation (GDPR). All necessary precautions are taken to ensure the security of data during collection, communication, or storage. You have the right to access, modify, and correct your personal data.

4.4. Exclusion

A deliberate false report constitutes a violation of the code of conduct and leads to disciplinary measures. If a person knowingly makes a false report, it may also have legal consequences.

5. Final Provision

For those parts of the group that are subject to laws or regulatory requirements that conflict with this policy, the stricter standard applies. This policy is not part of an employment contract.

National law remains unaffected by this policy. Where national law contradicts this policy, national law takes precedence.