

Whistle blower system – Rules of Procedure

§ 1 Scope

- (1) These rules of procedure apply to all information received via the whistle blower channel provided by the company.
- (2) The whistle blower channel can be used for all information that is (a) in connection with the legal interests protected by the German Supply Chain Due Diligence Act or (b) other indications of possible legal violations or violations of internal company guidelines under the Whistle Blower Protection Act or other national legal systems that implement the EU Whistle Blower Directive.

§ 2 Whistle blower channel

- (1) The whistle blower channel provided by the company consists of an e-mail address set up specifically for this purpose (hinweise@sws-p.de), which is operated by the external law office SWS Partner mbB commissioned by us and based in Deggendorf, Germany. The law office also provides a separate telephone number for telephone contact (+49 991 379175-298). As the main contact person of the law office, Mr. Thomas Sedlmayr is responsible for the receipt and the procedure described in § 3 paragraph (1) - (4) after receipt of a tip.
- (2) Access to the whistle blower channel is possible free of charge via the e-mail address provided; the phone number is used according to the conditions of the respective network operator.

§ 3 Procedure after receipt of a tip and protection of the person giving the tip

- (1) Information can be given in anonymous or non-anonymous form. The law office commissioned by the company to look after the whistle blower system will process all incoming information in compliance with the relevant data protection regulations (see separate data protection information) and in compliance with the legal requirements for whistleblower protection and the professional regulations of a lawyer licensed in Germany. The management of the whistle blower channel via an external law office also ensures that there is effective protection against discrimination or punishment as a result of a complaint. The law office is obliged to protect the confidentiality of the identity of the person providing the information, insofar as and for as long as this is desired. Furthermore, the law office performs its task as a neutral point of contact.
- (2) The person providing the information will receive confirmation of receipt of the information within seven days.
- (3) After receipt of the information, based on the facts submitted and any accompanying documents, an initial check is carried out to determine whether there is a relevant information, i.e. it is checked whether the information falls within the scope of application under Section 1 of these rules of procedure and is not obviously unfounded. Depending on the quality and scope of the information received, further clarification of the facts can be carried out via the law office commissioned by us. In the event of a rejection of a tip, this is done with appropriate justification to the person providing the tip.
- (4) After the initial test according to paragraph (3) has been carried out, if there is any relevant information, it will be forwarded to the respective responsible departments in compliance with the specifications from:
 - a) Information within the scope of protection of the Supply Chain Due Diligence Act to the respective department of the company responsible for implementation within the group of companies. In the event that the notified body is personally affected or if there is an assumed risk of a serious risk for the protected goods of the LKSG, corresponding internal company escalation levels are defined at the management level of the company.
 - b) Information within the scope of protection of the Whistle Blower Protection Act or other national implementations of the EU Whistle Blower Directive to the respective department of the company responsible for implementation within the group of companies. If the notified body is personally affected or if there is an assumed risk of a serious risk for the protected goods described in § 1 (2) (b), corresponding escalation levels are defined at the management level of the company.

(5) The case processing of the information received is coordinated by the departments responsible in paragraph (4), involving any other necessary specialist departments or other internal or external resources. Feedback to the whistleblower on the status of the case is given in joint consultation with the law office supervising the whistle blower system, but no later than three months after receipt of the tip-off. No feedback will be given to the person providing the information if this affects internal inquiries or investigations and the rights of the persons who are the subject of a report or who are named in the report.

§ 4 Option for amicable dispute resolution

For the time being, the company will not participate in the option for amicable dispute resolution.