

Whistleblower - System of the Vosseler Group

We would like to be informed about illegal behaviour in our company in order to be able to clarify and stop such behaviour. We therefore encourage everyone – whether an employee, former colleague, customer, supplier or third party – to report any information about legal violations to us.

By reporting this, you enable us to become aware of potentially harmful behaviours. Illegal behaviour can be uncovered at an early stage if you report it, potentially preventing imminent damage from occurring.

What are you reporting?

Only reports should be done where you have good faith that the facts you have reported are accurate, due to only in these cases is a protection for the person which is doing the report. The reporting person is not in good faith if he or she knows that a reported fact is untrue. If there is any doubt, the relevant facts should not be presented as facts, but rather as assumptions, evaluations or statements made by other people. **Please note that a whistleblower can commit a criminal offense if, against his better knowledge, he claims untrue facts about other people.**

We ask for your understanding that the whistleblower portal should only be used to report illegal behaviour. General complaints and product and service inquiries will not be processed. According to § 2 of the Whistleblower Protection Act, the subject of a report may be:

- 1. Violations that are punishable by law,
- 2. Violations that are subject to a fine if the violated regulation serves to protect life,

body or health or to protect the rights of employees or their representative bodies,

3. other specific violations of federal and state legislation as well as directly

applicable legal acts of the European Union in accordance with § 2 Section 1

No. 3 Whistleblower Protection Act.

Can you also report anonymously?

You can also send tips without mentioning your name.

If you want to report anonymously, please note that only if you report via the reporting portal, see below, confirmation of receipt within 7 days, feedback, questions or a status report within 3 months are possible.

If you otherwise contact or report anonymously, our whistleblower officer can only fulfil this communication obligation together with you if you follow up regularly.

If you are unable or you do not wish to identify yourself, what we accept, we ask you to ask within 7 days whether your tip has been received and at the end of the 3 months to ask what action was taken in response to the tip.

Please also note that if you contact us by telephone, a second call may be necessary if you call anonymously and the whistleblower officer's telephone is temporarily unmanned or busy. Please also note that you do not call from the company phone or write from your company email address, as this may be automatically logged in your company's systems.



Where do you report to?

Please report to our ombudsman

Mr. lawyer Wolfgang Schmid Katharinengasse 11b 86150 Augsburg Telephone: 0821 4540808 E-Mail: hinweisgeber@schmid-frank.de

Whistleblower portal as well as web-based and encrypted transmission via: <u>https://www.schmid-frank.de/sicherer-datentransfer</u>

If you click on the "For Whistleblowers" button on the website https://www.schmid-frank.de/sicherer-datentransfer, you have the option of transmitting documents and chat messages in encrypted form. Visiting the website cannot be detected by anyone.

According to § 13 Section 2 HinSchG, a report can also be made to an external reporting channel. In accordance with § 19 Section 1 of the HinSchG, the federal government establishes an office for external reports (external federal reporting office) at the Federal Office of Justice. Further reporting offices are the Federal Financial Supervisory Authority in accordance with § 21 Section 1 HinSchG and the Federal Cartel Office in accordance with § 22 Section 1 HinSchG. Reporting bodies of European institutions and organizations are the European Commission, the European Anti-Fraud Office, the European Maritime Safety Agency, the European Aviation Safety Agency, the European Markets Authority and the European Medicines Agency

What happens after the reporting?

The whistleblower officer takes your information, prepares a written report and sends it to the contact persons in the Vosseler Group who are responsible for educational measures and internal investigations.

You can read how your personal data is protected and treated confidentially under "Data protection information whistleblower system".

Thank you for your support.