

Whistleblower Protection Policy

by

Haff & Schneider GmbH & Co. OHG

(current status as of 30.11.2023)

Compliance with the principle of legality and responsible, fair and sustainable business practices have always been a top priority for Haff & Schneider GmbH & Co. OHG. We are convinced that only business conduct in accordance with our Code of Conduct will lead to long-term success.

Violations of applicable laws or internal regulations jeopardize the long-term success of the company, and therefore reporting possible violations or risks is an opportunity to avoid negative developments or consequences.

Our whistleblower system, with the reporting channels described below, serves as an early warning system through which information about possible violations can be reported. All reports received are investigated promptly. If a violation is identified during the investigation, it will be promptly remedied and the necessary steps will be taken to prevent future violations.

This policy describes the principles that apply at Haff & Schneider GmbH & Co. OHG for the submission of information through the reporting channels listed below. Various legal requirements are taken into account, including the requirements of the EU Directive 2019/1937 on the Protection of Whistleblowers and the German Whistleblower Protection Act (HinSchG).

1. Whistleblowing

1.1 Who can report?

Any person or organization that has become aware of a possible violation of applicable law or internal rules may submit a report about a possible violation within the company.

1.2 Where can a report be made?

A report can be made to the internal reporting office through the following channels:

by telephone: Reports can be made in German by calling +49 8361 921852.

by email: hinweis@haff-schneider.com

by mail: Haff & Schneider GmbH & Co. OHG
c/o Whistleblower
Obere Wank 2, 87484 Nesselwang

in writing: At the letterbox next to the time recording terminal on the first floor of the administration building.

in person: By prior appointment via the above-mentioned reporting channels.

1.3 What can be reported?

In principle, information on possible violations of applicable laws and internal regulations can be reported.

1.4 Can reports be made anonymously?

It is generally possible to submit reports anonymously if desired and not prohibited by law. However, it should be noted that there is no possibility of communication between the reporting office and the whistleblower and that the corresponding communication and information requirements no longer apply (see Section 2 "Processing of a Report").

2. Processing of a Report

2.1 What happens after receipt of a report?

Depending on the chosen channel and contact option, receipt of the report will be confirmed in writing.

2.2 How is the report processed and reviewed?

Once the report is received, it will be documented.

If the report concerns possible misconduct in your own business area, the relevant department will handle the matter according to the defined internal responsibilities. The person making the report will be informed of the department responsible for handling the report.

If there is sufficient evidence of a violation, the report will be promptly investigated in strict compliance with applicable laws, including, without limitation, data protection laws. In order to process the report, the relevant department may also ask questions of the person making the report in order to clarify outstanding issues and obtain further information, if necessary. In addition, depending on the individual case, follow-up action will be considered. This may include an internal investigation or, in the case of supply chain violations, discussions with suppliers.

The whistleblower will receive feedback on the status and outcome of the process.

2.3 How long does it take to process a report?

In principle, all reports are given high priority.

The processing time depends on the scope and complexity of the report and may take several months.

2.4 What can happen as a result of a report?

If a violation of applicable law or internal policy is confirmed, it will be promptly remedied and the necessary steps will be taken to prevent future violations.

3. Other Principles

3.1 How are whistleblowers protected?

Any form of discrimination against whistleblowers is prohibited and will not be tolerated.

This includes, for example, intimidation or negative employment consequences as a result of reporting. In addition to the prohibition of discrimination, internal procedures have been implemented to provide the best possible protection for whistleblowers, including the possibility of anonymous reporting.

Only a deliberately false report by the whistleblower can lead to negative consequences for the whistleblower.

3.2 How is confidentiality guaranteed?

The bodies responsible for handling the report will always treat the information provided confidentially, in particular personal data, and will process it on a "need-to-know" basis, i.e. only those bodies or persons who need to know will be informed. The identity of the person providing the information will also not be disclosed, to the extent that this is desired and legally possible, with the exception of statutory and official reporting obligations.

3.3 How is personal information protected?

The information provided will be treated in accordance with the GDPR; details on the processing of personal data can be found in the privacy policy of Haff & Schneider GmbH & Co. OHG privacy policy.

4. External Reporting Offices

In addition to the internal reporting points of Haff & Schneider GmbH & Co. OHG, there are also external reporting offices that must be set up by public authorities.

These hotlines have been established at the Federal Office of Justice (BfJ), the Federal Financial Supervisory Authority (BaFin) and the Federal Cartel Office (Bundeskartellamt), whereby the whistleblower is basically free to choose whether to contact the internal hotline or an external hotline of the authorities.