

## Rules of Procedure of the brandgroup whistleblower system

Identification: I\_M1211\_S\_BG\_-\_001\_EN

Index: A

Status:

Effective

Classification:

internal



### Rules of Procedure of the brandgroup whistleblower system

In accordance with the requirements of the Whistleblower Directive 2019/1937 (WBRL), we offer the possibility to report violations of applicable law and internal regulations that have arisen from the economic activities of the brandgroup in its own business organization through a web-based reporting system to be found here:

<https://brandgroup.integrityline.com/frontpage>

The procedure for submitting a report and its processing within the framework of the web-based complaint system is explained below. These procedural rules apply to all brandgroup companies that are stored in the reporting system.

Submitting a report is possible anytime and free of charge. In addition to submitting a report by means of a web-based questionnaire, you can also submit a report by audio message. For this purpose, you can use a sound clip application, where you can record a message. In order to ensure your anonymity, your voice is distorted accordingly in the audio file created. All information provided to us can be submitted anonymously if you wish and if so selected in the submission process.

In order to be able to process possible reports appropriately, we would like to ask you to create and use a secure and protected mailbox within the web-based whistleblower system. Through this protected mailbox you enable the compliance officer, appointed by brandgroup to process the report, to discuss the matter with you if necessary. For this purpose, you will receive a case ID after submitting the report and you can log in to your protected mailbox with a password created by yourself. To process the report effectively, we depend on your assistance and would like to ask you to regularly check the contents of the mailbox.

The registration office representative is obliged to maintain confidentiality.

Below you can find further information on how your report is processed:

#### **What happens after your report has been received?**

After you have submitted a report, you will receive an acknowledgement of receipt immediately, but no later than seven days after you have submitted the report.

#### **Who processes the report?**

The report is assessed and processed by the registration office representative, who has been appointed by the brandgroup for this purpose.

#### **What procedural steps will follow?**

After receipt of a report, it is first checked for plausibility. In particular, the registration office representative will check whether the incident reported might be considered as a violation of applicable law or internal regulations. If this is not the case, you will receive a corresponding notification. Abusive reports will, however, not be investigated.

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If the reported incident is considered to be a violation of applicable law or internal regulations and there are any open questions regarding the facts of the incident, the the registration office representative will communicate with you via the protected mailbox regarding the facts. Therefore, its is of particular importance that you remember the case ID and your personal password for the protected mailbox.

At the latest upon clarification of the fact, the registration office representative shall make a proposal to the entity in order to remedy the violation. The entity decides what measures are to be taken to solve the reported incident or to prevent any violations.

The registration office representative will inform you of the results of the assessment within 3 months (or within 30 days if required by law) upon the submission. In factually or legally complex cases, this period may be extended in accordance with the applicable legal provisions. In such cases, you will be informed of the extension and the reasons for it.

### Confidentiality and data protection

All information, documents and files provided to us in the report will be treated confidential and in compliance with the relevant data protection laws and other legal provisions. Without your express written consent, your identity will not be disclosed to any person other than to the compliance officer. This also applies to all other information from which your identity can be directly or indirectly deduced.

### Investigations

Investigations conducted on the basis of reports are carried out objectively and impartially. The presumption of innocence applies to the accused persons. All investigative measures must be suitable, necessary and appropriate. An investigation will only be initiated after careful examination of the report and is based on whether there are concrete indications of a violation of the law or internal regulations.

### Protection against discrimination

Any form of retaliation, threat or attempt of retaliation is prohibited. All reporting persons are protected from retaliation and punishment by the respective entity of the brandgroup. Punishment comprises direct reactions to a report (e.g. warning or dismissal), while retaliation comprises consequences that have a causal link to the report (e.g. discrimination or denial of promotion).

Employees who knowingly or negligently submit false reports may be subject to consequences under labor law and, if applicable, claims for damages. Furthermore, there is no protection against prosecution by the state. Disclosure by the reporting person of the subject matter of the report to third parties or disclosure of the reporting person's identity without the consent of the brandgroup is not permitted. This would lead to a loss of protection against retaliation or punishment.

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