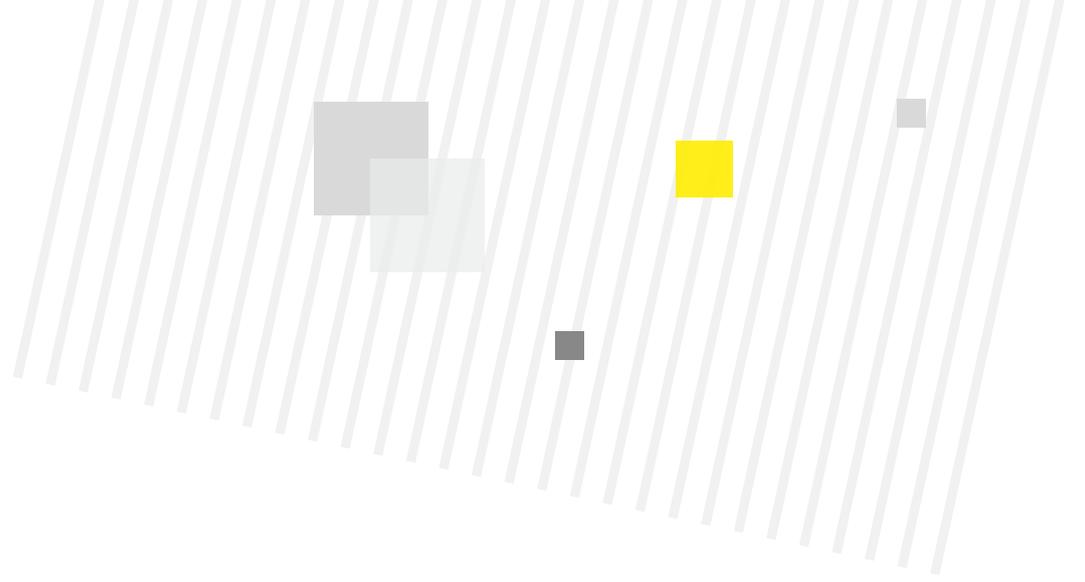


# Rules of Procedure for the SSI SCHAEFER Whistleblowing System

*Think Tomorrow.*



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For the sake of linguistic simplification and better readability, the designation of persons or groups of persons in this document refers in the following to persons of any gender. The term “employees” also includes managers at all levels and members of executive bodies.

# Introduction

As a family-owned business, the SSI SCHAEFER Group is dedicated to fundamental values and principles. Integrity, fair competition and sustainable business are of utmost priority for safeguarding future success.

This includes ensuring that the SSI SCHAEFER Group observes all applicable legal provisions and that we comply with our internal regulations. We also expect our business partners along the entire supply chain to act in accordance with the law and, in particular, to respect human rights and comply with environmental standards.

For the SSI SCHAEFER Group to be able to eliminate risks and potential breaches of applicable legal provisions or internal guidelines and prevent them in the future, it must become aware of these at an early stage. For this purpose, we rely on reports from employees and external parties.

The SSI SCHAEFER Group has therefore set up a Central Internal Reporting Office (CIRO) at Group Compliance to which anyone who has observed potential misconduct or identified risks can submit a report. Such reports can be submitted, in particular, via the digital SSI SCHAEFER Whistleblowing System, which is available at all times and meets the highest security standards.

The SSI SCHAEFER Group will examine all incoming reports and take necessary measures in each individual case. When processing reports, the protection of the reporting person and the personal rights of the persons concerned by a report have the highest priority.

Reporting persons who report possible misconduct in good faith do not have to fear any retaliation. Only those who deliberately make a false report, for example to deliberately harm other employees, must expect negative consequences.

These Rules of Procedure summarize the essential information set out in the SSI SCHAEFER Group's Whistleblowing Policy regarding the submission, receipt and processing of reports, as well as the protection of the reporting person and the persons concerned.

# 1. Who Can Submit a Report?

Via the SSI SCHAEFER Whistleblowing System and the other reporting channels that are provided by the SSI SCHAEFER Group, reports can be submitted by:

- all employees of the SSI SCHAEFER Group,
- all employees of the SSI SCHAEFER Group's direct and indirect suppliers along the entire supply chain,
- all other persons or organizations, in particular those who have observed or identified risks or potential breaches or may be affected by them.

# 2. What Can Be Reported?

The SSI SCHAEFER Whistleblowing System can be used to submit reports pertaining to the following issues:

- potential breaches of legal provisions
- potential breaches of the internal policies of the SSI SCHAEFER Group,
- issues that present human rights, environmental, health or safety risks.

In the SSI SCHAEFER Whistleblowing System, you will be asked to assign your report to one of the following categories:

- Corruption / bribery
- Breaches of competition and antitrust law
- Fraud / embezzlement / theft / disclosure of trade secrets
- Human rights-related risks and breaches of human rights / breaches of labor standards / discrimination / harassment
- Environment-related risks and breaches of environmental, health and safety regulations
- Breaches of accounting, financial reporting or tax regulations / forgery of documents
- Breaches of regulations on the prevention of money laundering and terrorist financing / breaches of export control and customs regulations
- Other breaches of legal provisions and significant breaches of internal policies of the SSI SCHAEFER Group
- Human rights and environment-related risks along the entire supply chain / breaches committed by suppliers of the SSI SCHAEFER Group.

### 3. Who Receives the Reports Within the SSI SCHAEFER Group and Are the Reports Treated Confidentially?

The SSI SCHAEFER Group has set up a Central Internal Reporting Office, which consists of employees from the Group Compliance department. These employees guarantee impartiality, are obliged to maintain confidentiality and are independent in the performance of their duties.

When processing the report, the Central Internal Reporting Office follows the need-to-know principle, i.e. only the persons and departments necessary for the processing of the report and for any follow-up measures are informed. The SSI SCHAEFER Whistleblowing System can only be accessed by employees working for the Central Internal Reporting Office. The identity of the reporting person is also protected accordingly. Mandatory statutory or official reporting obligations are excluded from this; SSI SCHAEFER must comply with these accordingly. In addition, data protection regulations are complied with. Our data protection information for the SSI SCHAEFER Whistleblowing System can be found here: <https://www.ssi-schaefer.com/en-de/privacy>

### 4. How Can a Report Be Submitted?

The SSI SCHAEFER Group has implemented a centralized digital whistleblowing system that meets the highest security standards and can be accessed by all employees and business partners of the SSI SCHAEFER Group as well as any other third party at any time via the internet at the following link:

SSI SCHAEFER Whistleblowing System: <https://www.bkms-system.com/ssi-schaefer>

Reports can be submitted in any language and anonymously if desired. A postbox can be set up as an option to continue communication with the Central Internal Reporting Office even after a report has been submitted. It can be used to ask additional questions by the Central Internal Reporting Office and for the reporting person to receive information on the status of the case.

In addition, the SSI SCHAEFER Group has also set up further reporting channels:

- **Via e-mail:** [investigations@ssi-schaefer.com](mailto:investigations@ssi-schaefer.com)
- **Via phone:** +49 2735 70 9594 (during business hours)
- **Via mail:** FRITZ SCHÄFER GMBH & CO KG | CONFIDENTIAL  
Group Compliance - Central Internal Reporting Office  
Fritz-Schäfer-Str. 20 | 57290 Neunkirchen | Germany
- **In person:** by prior arrangement via [investigations@ssi-schaefer.com](mailto:investigations@ssi-schaefer.com)

If an additional local reporting channel has been established in individual countries due to national legislation, this channel may equally be used in the respective country.

Irrespective of these reporting channels, employees can always contact their supervisors and report observed misconduct to them.

If reports are made via local reporting channels, to superiors or, in certain cases, are received via other channels than officially provided by the SSI SCHAEFER Group, the recipients – to the extent permitted by law – forward them to the Central Internal Reporting Office for further processing.

The SSI SCHAEFER Group encourages reporting persons to contact the SSI SCHAEFER Group in confidence via the internal reporting channels for effective processing of their report. This by no means restricts the possibility of contacting an external reporting office. Information on external reporting offices in the different European countries is provided by the Central Internal Reporting Office in the Group Compliance section of the SSI SCHAEFER intranet.

## 5. How Do I Submit a Report via the SSI SCHAEFER Whistleblowing System?

The SSI SCHAEFER Whistleblowing System provides step-by-step guidance through the process of submitting a report once you have clicked on the “submit report” button:

- First, you will be shown a few safety instructions, also for the case that you wish to remain anonymous. You will also be asked to read the data protection information and give your consent. To protect the system, you will also be asked a security question.
- You will then be shown various reporting categories. You will be asked to classify your report in the category that best applies to your report. By clicking on the information button, you will receive explanations and examples for each category. You can't go wrong here: processing of the report is guaranteed regardless of the category selected.
- The next step gives you the opportunity to formulate your report in a free-text field. You can also upload additional files of up to 5 MB. Your information should be truthful and as detailed as possible. You will also be asked to answer a few questions. Please answer these if you have the corresponding information. After submitting your report, you will receive a reference number as proof.
- You can then set up your own protected postbox. We will use this to ask questions and keep you informed of the processing status. Especially if you choose to remain anonymous, we ask you to set up a postbox, as we otherwise have no way to contact you. It is possible to set up a postbox while maintaining anonymity. If you have already set up a protected postbox, you can access it directly via the “Login” button.

## 6. What Information Should Be Included in the Report?

The information provided in the report must be truthful and should be as accurate and comprehensive as possible. Details can also be of relevance. The following information is usually of importance:

- Who are the persons involved?
- When, for how long and where did or do the actions take place?
- Which companies or business partners of the SSI SCHAEFER Group are affected?
- Which other persons (employees, business partners, third parties) are also involved?
- What exactly is the suspected breach?
- If any damage is possible, can it be approximately estimated?
- Who is aware of the matter? Has it already been reported somewhere else?

Of course, a report can also be submitted if only some of this information is available. If there is no precise knowledge regarding certain aspects, but a mere presumption exists or an own conclusion is drawn, this should be communicated accordingly.

## 7. What Happens to My Report After I Have Submitted It?

The Central Internal Reporting Office will document the receipt of your report and send you a written confirmation within seven days, provided we have a way of contacting you (e.g. postbox in the SSI SCHAEFER Whistleblowing System). Following this, your report will be subjected to an initial review and plausibility check by the Central Internal Reporting Office. We may contact you with additional questions.

The Central Internal Reporting Office will then decide on follow-up measures. This may include, in particular, the initiation of an internal investigation to clarify the reported facts. If the report concerns a potential breach at a supplier, supplier discussions or supplier audits may be considered. If the report does not fall under the responsibility of the Central Internal Reporting Office, it will inform you of the appropriate point of contact or, in the case of anonymous reports with no means of communication with the reporting person, will forward the report to the appropriate point of contact.

When processing the report, the Central Internal Reporting Office follows the need-to-know principle, i.e. only the persons and offices required to process the report will be informed. You will also receive feedback on the status of the processing of your report within three months of the confirmation of receipt of the report. This includes information on the measures taken and planned to date, provided that the purpose and success of an internal investigation or other investigations are not affected by this, and the rights of the persons concerned or named in the report are not unreasonably impaired.

The Central Internal Reporting Office concludes the processing of the report if it does not provide sufficient evidence for an internal investigation, another department is responsible and you have been informed of this or the report has been forwarded to that department or an internal investigation has been completed.

## **8. What Is an Internal Investigation and Who Conducts It?**

An internal investigation is an internal measure carried out by the SSI SCHAEFER Group itself with the aim of clarifying potential breaches reported. Internal investigations are regularly carried out by the Internal Investigations team within the Group Compliance department.

The employees of the Internal Investigations team are also members of the Central Internal Reporting Office. They are appropriately trained to carry out internal investigations and conduct them impartially, fairly and in compliance with all legal requirements. Depending on the circumstances, other departments, or external parties, such as lawyers, may support or lead the internal investigation in conjunction with Group Compliance - Internal Investigations. At the end of the internal investigation, a final report is drawn up, which usually also contains recommendations for further measures.

## **9. How Long Will the Processing of the Report Take?**

Incoming reports are always processed with high priority. However, the processing time depends on the scope of the incoming report, its complexity, and the available options for investigating it. Therefore, it must be expected that processing may take several months. Especially, if the processing of the report requires an internal investigation, a longer processing period is to be expected.

## **10. What Can Be the Result of a Report?**

If it is determined that an observed behavior constitutes a breach of legal provisions or internal regulations, it will be rectified immediately. In addition, the necessary measures are taken to prevent such or comparable breaches in the future. In this respect, process adjustments may be made, but personnel measures may also be taken. If a human rights or environmental risk is identified, all necessary measures are taken to eliminate it as well.

## 11. How Am I Protected as a Whistleblower?

The SSI SCHAEFER Group comprehensively protects whistleblowers who report potential misconduct or risks in good faith from any retaliation. The threat of retaliation or the attempt to commit retaliation are also not tolerated by the SSI SCHAEFER Group and will be considered a breach of the Code of Conduct of the SSI SCHAEFER Group. This of course also applies if the potential misconduct you have reported in good faith is not confirmed after further investigation.

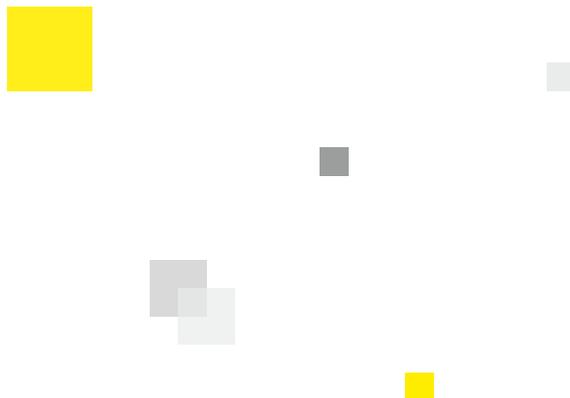
However, false reports made deliberately or through gross negligence are excluded from protection against retaliation, e.g. if you deliberately report incorrect information with the aim of falsely accusing a colleague. In these cases, you may also face further legal ramifications, such as an obligation to pay compensation for damage caused by the false report.

## 12. How Am I Protected if I Am the Person Concerned by a Report?

As the person concerned by a report, you are also protected in several ways. Firstly, your identity is protected in accordance with legal provisions and only disclosed in line with the need-to-know principle. Exceptions to this are mandatory statutory or regulatory reporting obligations.

If an internal investigation is carried out on the basis of a report, it is always conducted fairly, impartially and in compliance with the personal rights of the persons concerned. Investigations are carried out in compliance with their legal requirements, data protection and the principle of proportionality.

The risk of being affected by a deliberate false report is also reduced by the fact that in the event of deliberate or grossly negligent false reports, the reporting person is not granted protection from retaliation by the SSI SCHAEFER Group and may face further legal ramifications.





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