

Rules of the whistleblowing procedure at DRÄXLMAIER



Rules of procedure for whistleblowing at DRÄXLMAIER

All employees and business partners of the DRÄXLMAIER Group are encouraged to report violations in order to limit the consequences of actions that are not allowed by law or our internal rules and values, and to prevent future misconduct.

We have therefore established an effective complaints procedure to report breaches of our Code of Conduct and law violations. This system ensures consistent and fast processes as well as confidential and professional reports handling by internal experts.

The most important information about the complaints procedure is presented below in an understandable manner, in order to provide the greatest possible transparency.

What kind of complaints and notifications are handled by our procedure?

The complaints procedure can be used to report indications of possible violations of laws and/or regulations, including human rights, environmental or compliance risks and violations relating to one's own business unit as well as along the entire supply chain.

This includes in particular misconduct in connection with

- bribery and corruption,
- unfair competition, in particular cartel agreements,
- human rights violations,
- serious environmental damage,
- harm to the health and safety of persons,
- fraud, embezzlement, theft, misappropriation,
- money laundering,
- data protection and information security,
- sexual harassment or discrimination,
- conflicts of interest.

Which complaint channels can you use to submit a complaint?

All employees and external persons can submit complaints through the following channels:

- Via the [electronic whistleblowing system](#) "Integrity Line". This reporting channel can be used worldwide, around the clock, free of charge and in all languages of the DRÄXLMAIER sites.
- By e-mail or telephone directly to the Compliance Department:
 - E-Mail: compliance-office@draexlmaier.com
 - Telephone: +49 8741 47 6561
- In person: If you wish to report in person, please arrange an appointment in advance via compliance-office@draexlmaier.com.

Please note that information received via the "Integrity Line" electronic whistleblowing system will be processed by the Compliance Office of Fritz Dräxlmaier GmbH & Co. KG, Landshuter Straße 100, 84137 Vilsbiburg, Germany, which has been entrusted by all companies of the DRÄXLMAIER Group with the tasks of an internal reporting office.

Employees also have the following channels at their disposal: The direct supervisors, the HR organization at the location, the local employee representation, the local compliance officer, the ombudsman (where available) and complaint mailboxes.

How will my report be handled?

Regardless of which communication channel is chosen, we treat all information confidentially. However, we are obliged to comply with legal obligations to provide information to authorities as well as legal exceptions to the confidentiality requirement. The confidentiality of the identity of the person providing the information and of the other persons named in the information is maintained throughout the entire process.

All information received via the electronic whistleblowing system, the Compliance Department or Compliance Officer is processed by the Compliance Department (hereinafter referred to as the Complaints Office). The officers dealing with the whistleblowing are impartial, independent in the performance of their duties and bound to secrecy. They are also obliged to comply with data protection regulations and to ensure transparency and the rights of all persons concerned.

How am I protected as a whistleblower?

Protecting whistleblowers from being discriminated against or penalized for making complaints or providing information is an important part of our complaints procedure. Intimidation and reprisals against people who report actual or suspected misconduct in good faith will not be tolerated.

If you feel that you are suffering intimidation or reprisal as a result of your whistleblowing, please contact the Complaints Office; such intimidation or reprisal will also be investigated and, if necessary, further investigated in accordance with the procedures outlined above.

If whistleblowers are employees of a direct supplier, the company will seek to make appropriate contractual arrangements with the supplier.

What happens after I have submitted my report?

Receipt of the report

After a report has been received, this is documented internally. The person submitting the report receives an acknowledgement of receipt within one week.

Examination of the report

The Complaints Office first checks whether sufficient information is available to examine and investigate the reported facts. If this is not the case, the Complaints Office will, if possible, contact the whistleblower to ask for further information. If neither sufficient information is available nor contact is possible, the case will be closed.

Clarification of the facts

The Complaints Office will either investigate the facts of the case comprehensively or forward it to the competent body. Investigation takes place within the company, which respects the principle of confidentiality and data protection. If necessary, and as far as possible in the case of anonymous reports, the Complaints Office or the competent department will discuss the facts of the case with the person making the report and, if necessary, ask for further information.

If, after clarification of the facts, discussion and investigation, the Complaints Office or the competent department is convinced that there are no compliance-relevant legal violations, human rights or environmental risks or violations of human rights or environmental obligations in its own business area or at suppliers, the case will be closed.

Develop a solution

If the Complaints Office or the competent department is convinced that the investigation confirms the existence of relevant legal violations, human rights and environmental risks or violations of human rights or environmental obligations in its own business area and at suppliers, a proposal for further action (in particular, preventive and remedial measures) is drawn up. The person making the report will be involved to the degree that is possible and reasonable.

Implementation and follow-up

The implementation of the proposed solution is finally followed up by the Complaints Office or the competent department.

Conclusion of the procedure

The person making the report will be informed about the conclusion of the complaint procedure, if the possibility of contact exists. The processing time is highly case-dependent and can therefore take from a few days to several months. However, we will endeavor to conclude the investigation in a timely manner.