

# Information on the use of the Uhlmann Whistle Blower System

## Preliminary note

Uhlmann sees the introduction of a whistleblowing management system as an essential and necessary component of the Uhlmann compliance management system.

All employees can make a complaint or point out circumstances that indicate a violation of a law or the Uhlmann Code of Conduct. Employees can contact their supervisors, the management, the works council, or the compliance officer responsible for their legal entity.

In addition, an independent law firm has been appointed as a trust lawyer to whom employees can turn. Based on whistleblower's wish, the trust lawyer has also fully preserved whistleblower's anonymity. The use of the trust lawyer is voluntary. However, Uhlmann appeals to all its employees to report concerning information on violations of law, legislation, and internally binding regulations at Uhlmann, but without misusing the system for other purposes.

## 1. Position of the trust lawyer

The trust lawyer act as a professional, independent and autonomous lawyer and is not subject to any instructions by Uhlmann about the handling of the content of the reported matter, insofar as this would violate the confidentiality assured to the whistleblowers.

The trust lawyer shall decide based on his own due diligence whether and to what extent he may pass on to the company any facts submitted to him. Personal data of the whistleblower may only be passed on to Uhlmann with its consent.

## **2. Competence of the trust lawyer**

The trust lawyer only accepts tips on irregularities concerning to compliance-relevant facts. This includes the suspicion of a violation of laws and legislation or a breach of internal binding rules of conduct. The aim is in particular the clarification and prevention of economic offences, balance sheet offences and significant financial losses. Relevant laws are therefore criminal laws with a focus on corruption, breach of trust, fraud, bribery, tax evasion, rules of conduct antitrust law, as well as standards or regulations under company law relating to responsibilities and liability of companies and corporate bodies. Internal rules of conduct include, in particular, the Code of Conduct and other binding regulations, as well as stipulations in individual contracts, insofar as they affect the above-mentioned legal fields.

## **3. Dealing with reports**

The reported information will be investigated in accordance with applicable laws, internal rules and in consideration of the interests of all parties involved.

If, after a plausibility check, there is sufficient suspicion of a violation of criminal law, of the Code of Conduct or other internally binding regulations, the trust lawyer forwards the information to the compliance officers at Uhlmann. In doing so, the trust lawyer will - based on the decision to be taken by the whistleblower - also maintain the anonymity of the whistleblower vis-à-vis Uhlmann. All reports will be treated confidential at all times, even if the whistleblower's name is mentioned.

The trust lawyer does not conduct his own investigation. Rather, the Compliance Officers at Uhlmann shall initiate an investigation of the facts communicated by the trust lawyer. In the performance of their duties, the Compliance Officers are supported by every unit in the company. The legal assessment of the facts investigated and the determination of suitable measures to eliminate and prevent improper business practices are carried out by the Compliance Officers in cooperation with the internally responsible departments. If necessary, the trust lawyer can be called in as an advisor.

Measures may include, for example, appropriate civil action or the involvement of an authority. Even if no violations are found in a specific case, proposals for changes to work, business processes and changes to organizational and behavioral rules may be appropriate.

The whistleblower may contact the trust lawyer at any time to receive information on the status quo on its report. At the latest after completion of the investigation process the whistleblower shall be informed of the result by the trust lawyer to the extent legally permissible.

#### **4. Anonymity and protection of the whistleblower**

If the trust lawyer has assured the whistleblower not to disclose whistleblowers name and identity to Uhlmann or third parties without whistleblowers prior consent, the trust lawyer is legally bound by this promise. Should the trust lawyer be questioned as a witness in criminal, civil or other proceedings, he may only disclose the name and identity of the respective person if he is expressly permitted to do so by both Uhlmann and the person providing the report.

Whistleblowers are generally protected from discriminatory or disciplinary action. Any retaliatory action against the whistleblower will not be tolerated and will be sanctioned by Uhlmann.

#### **5. Prohibition of abuse**

The interest of whistleblowers to protect their identity is countered by the interest of the persons affected by the whistleblowing in disclosure of the reported information. Uhlmann will not tolerate any kind of deliberate abuse or willful misconduct of the opportunity to submit complaints and tips. For this reason, the trust lawyer will point out to the whistleblower in the first conversation that in the event of abuse or misconduct of the whistleblowing system, the identity of the whistleblower may be disclosed to Uhlmann.

## **6. Data protection**

The trust lawyer and Uhlmann shall ensure compliance with the statutory retention obligations and the provisions of data protection law. The personal data collected is limited to information on the identity, function and contact information of the persons concerned and the persons providing information as well as the other personal data that is essential for processing the respective matter. In addition, only reported information, processing details, follow-up of the report and audit reports are stored.

The retention period for personal data collected in the context of point outs and investigations shall be two months after the closure of the investigation. This period shall be extended accordingly if the closure of the investigation is followed by disciplinary or judicial proceedings for which the data concerned must be used.

The persons affected by a report will be informed by the Uhlmann compliance officers as early as possible.

The company shall inform the relevant persons as far as possible about the information received, point out their duty to provide information and their rights of rectification. However, if there is a significant risk that such notification would endanger the investigation of the reported information, notification may be postponed until the investigation has been completed or the relevant risk has ceased to exist.

## 7. Optional reporting channels

### a) Internal:

- Supervisor
- Local Compliance Officer
- [compliance@uhlmann-group.com](mailto:compliance@uhlmann-group.com)

### b) External:

The **trust lawyer** can be contacted ANY TIME as follows:

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