Policy Related to the Treatment of Whistleblowers by the egeplast international GmbH – egeplast Group

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egeplast international GmbH
Robert-Bosch-Straße 7
48268 Greven, Germany

Phone +49 2575 9710-0
Fax+49 2575 9710-110
info@egeplast.de
www.egeplast.de

Managing Director:
Dr. Ansgar Strumann, Dipl.-Ing. Torsten Ratzmann, Dipl.-Kfm. Steffen M. Saur

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1. Purpose of the Policy

egeplast international GmbH, or the egeplast group in general, promote a culture of freedom of expression. In the company's Declaration of Values, egeplast employees are encouraged to engage in constructive objection in order to point out potential ways for improvement or existing shortcomings.

Furthermore, both employees and stakeholders are granted the freedom to report potentially unlawful, unethical or societally irresponsible kinds of behaviour or other types of irresponsible actions on the part of the group or members of the group without needing to fear sanctions or other disadvantages.

The egeplast group is intent on:

- Promoting the disclosure of misconduct;
- Contributing to prevent misconduct in compliance with the company's risk management and management system;
- Ensuring that individuals who expose instances of misconduct covered by the scope of this Policy can do so safely and without incurring any risks and that they can rely on being protected and supported;
- Ensuring that any revelations are dealt with appropriately and in a timely manner;
- Creating transparency with regard to the corporate concepts for receiving, handling and verification of disclosures;
- Promoting the company's values and Code of Conduct;
- Promoting the longterm sustainability and reputation of the company;
- Complying with the legal and regulatory obligations of the company;

2. General Principles Behind the Policy

The general principles that this policy is based on consist in the behaviour of a "honorable merchant" which the egeplast group has anchored in its corporate policy or IMS policy, its Code of Conduct, its Declaration of values as well as the legal and regulatory obligations.

3. Protective Measures

The present Policy supports reporting potential issues or shortcomings/abuses and grants individuals who disclose critical information effective protection from victimisation, stigmatisation or dismissal by means of introducing proper systems which at the same time improve sustainability and promote the group's reputation.

The protective measures do not only apply to in-house disclosures, but are also valid for disclosures towards lawyers for the purpose of obtaining legal advice in accordance with the whistleblower protection provided for in the Corporations Act. They also apply for certain supervisory authorities and other external bodies, and for disclosures which are in the public interest and for emergency disclosures.

Any hints, complaints and information can be provided to egeplast via confidants or third parties, e. g. the members of the works council, executives, management assistents or attorneys. The contacts are listed in the attachment.

4. Scope of Application

Pending implementation of the German law on the protection of whistleblowers (HinSchG), the EU Directive 2019/1937 shall apply.

This Directive shall be applicable to all employees, interns, trainees, suppliers, customers, banks, other interested parties and family members.

Among other elements, its scope of application covers the aspects listed below and more, e. g. human rights, corruption, fraud, misconduct, negligence, in particular:

- Public procurement
- Financial services
- Funding of terrorism
- Product safety
- Road safety
- Environmental protection
- Nuclear safety
- Food and feed safety
- Animal health and animal protection
- Public health

- Consumer protection
- Privacy
- Data protection
- Security of networks and information systems
- Internal market rules within the meaning of art. 26 para. 2 TFEU incl. EU competition regulations
- Corporation tax laws
- Infringements of the financial interests of the EU within the meaning of art. 325 TFEU.

5. Notification and Filing

The egeplast staff shall be notified about this Directive via all egeplast channels and the information shall be made available on the internal and external websites.

6. Reporting Channels

egeplast stakeholders are provided with various (currently not anonymous) reporting channels for complaints and submission of information. These channels are open to everyone, irrespective of the existence or type of their contractual or business relationship with egeplast or its affiliated companies. Both internal and external emails can be sent to Info@egeplast.de.

In-house, there is the option to approach specifically authorized personnel, superiors; members of the works council or the management directly. For this purpose, you find links e.g. on the homepage of the egePortal which enable you so send emails directly to the Management. Also, we offer regular consultation hours, so-called round table events for the entire staff at our various locations. Upon request, we also offer personal appointments or talks.

As a matter of principle, all messages and hints shall be treated confidentially and are assured proper processing by the department in charge or the in-house contacts. The ombudsman for internal stakeholders is the shop stewart.

7. Anonymity and Discretion

All employees undertake to act respectfully and discreetly in any potential instance. The information and minutes are not supposed to identify the whistleblower by name, although the ombudsmen are also expected to provide for the possibility to ask questions.

8. Obligation to Provide Assistance

All employees shall be required to provide the whistleblower with optimal support. If needed, the whistleblower shall be provided with a suitable counsel or such a counsel shall be arranged for or experts will be consulted respectively. Public authorities can expect provision of information and cooperation provided that the reporting individuals will not be compromised by these steps. Before taking legal action or initiating other measures which might compromise the victims' wellbeing or integrity, the latter shall be asked to provide their written consent.

9. Procedure Related to Submitting a Report

To ensure that your report can be handled and analysed properly, it is important to keep it as specific as possible. In this context, it is helpful to take the five questions indicated below into account:

Who? What? When? How? Where?

Once a whistleblower has submitted a report, they will receive an acknowledgement of receipt within one week (only possible if we are not dealing with an anonymous report). Next, the hint will be processed and the whistleblower notified about the status of the processing of the report within 3 months following receipt of the confirmation of receipt.

We assume that the reported incidents do not represent untenable assertions. We take whatever incidents are reported to us very seriously, carry out our own investigations and will then adopt appropriate measures. False accusations or misleading reports shall be prosecuted. There will be no retaliatory measures in response to an honest report of an alleged violation.

10. Risk Assessment

Any reported incidents are centrally collected by the Management Assistant and queried in the group on a regular basis. The reported incidents will be anonymised and presented to the Management and/or the affected divisions and analysed. To the degree possible, the potential risk will be included in the analysis assessing opportunities and risks, followed by initiation of the proper measures. The effectiveness of these measures will be reviewed following their implementation and adapted accordingly if needed.

11. Documentation and Filing

Processing of the personal data is compliant with the General Data Protection Regulation (GDPR). The analysis of the opportunities and risks involved is maintained and continued on an ongoing basis. If the risk ceased to exist, the analysis can be removed after one year. The information related to the reported incidents provided by the whistleblower will be filed. The annual reports shall be kept for 10 years minimum.

12. Reporting

All notifications shall be represented as a figure for "reports per year" in the annual sustainability report and categorised under "high", "medium" and "low" risk and the measures taken identified as "effective" and "not effective". False reports or unusable information will not be considered.

Greven, 22 March 2023

Dr. Ansgar Strumann
Managing Director

Dipl.-Kaufm. Steffen M. Saur
Managing Director

Dipl.-Ing. Torsten Ratzmann

Managing Director

Attachment A: Contacts

Mailing address:

egeplast international GmbH
Robert-Bosch-Str. 7
D-48268 Greven
Germany

Via email: **Info@egeplast.de**

By telephone: **+49.2575/9710-0**

Via the works council/ombudsmann: **Betriebsratsvorsitzender@egeplast.de**

Via Management: **Geschäftsführung@egeplast.de**

egePortal: On the homepage under "useful links"



Useful links

Feedback to the editor of egePortal

Feedback to the Management

Bistro