



Whistleblower Policy

Aumann-Group

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Summary

The Aumann Group's whistleblower system is intended to enable employees and other persons to provide information on an anonymous basis. The whistleblower system is intended to record such information in a comprehensible process that ensures the best possible protection of the legitimate interests of those involved. The purpose of the whistleblower system is to prevent both financial damage to the company and a loss of image.

Notices are provided only for the following categories of criminal or near-criminal rule violations:

- Conflicts of interest,
- Capital market law,
- Corruption and bribery,
- Public procurement,
- Financial services, financial products and financial markets,
- Prevention of money laundering and terrorist financing,
- Product safety and conformity,
- Traffic safety,
- Environmental protection,
- Radiation protection and nuclear safety,
- Food and feed safety,
- Animal health and welfare,
- Public health,
- Consumer protection,
- Protection of privacy and personal data,
- Security of network and information systems, as well as
- Competition law.

This Whistleblower Policy is also intended to ensure, from a technical and organizational perspective, that reports of violations of laws, the Code of Conduct or guidelines can be received in accordance with the requirements of the Code of Conduct as well as data protection and data security and can be processed, stored and archived with the necessary confidentiality.

Where local regulations are stricter than the minimum standards set out in this Policy, the stricter rules shall apply in each case. If there is a conflict between relevant laws and this Policy, the affected company shall inform the Chief Compliance Officer in order to resolve the conflict.

Scope of application

This policy applies to all officers, directors, employees, contractors and temporary workers in all locations worldwide and to all Company representatives, including consultants and agents.

Effective date

This guideline comes into force with effect from 1st September 2023.

Directive content

Obligation to report

Every employee of the Aumann Group and other persons are entitled to submit tips. In particular, it is irrelevant whether they are employees of the Aumann Group or a subsidiary of the Aumann Group.

To the extent permitted by law and to the extent consistent with conducting an adequate investigation, the Company will protect the confidentiality and anonymity of the person making the report.

This guideline does not oblige anyone to provide information. However, if there are legal, contractual or other duties or obligations to provide information, these are not affected by the above paragraph.

No retaliation

Employees and others who report will not be subject to harassment, retaliation, or adverse consequences with respect to their employment, such as discharge, demotion, suspension, discrimination with respect to the terms and conditions of employment.

Employees and associated persons who retaliate against an individual who has reported an incident in good faith will be subject to disciplinary action, up to and including termination.

Submission of reports

The submission of notices of actual or suspected violations shall be made possible as follows:

- Tips can be reported confidentially to the direct supervisor;
- Information can be reported directly and confidentially to the Compliance Department;
- Tips can be reported directly via the digital whistleblower system.

In the digital whistleblower system, the types of report are technically predefined. In all other respects, however, the submission of reports is not bound to specific forms. An up-to-date overview of the reporting channels can be found at: [Corporate Governance | Aumann AG](#).

Relevant notes

The whistleblower system is used exclusively for receiving and processing reports of actual or alleged violations of laws, guidelines or the Code of Conduct. In particular, it is not available for general complaints or for product and warranty inquiries.

Only those tips should be given where the whistleblower has a good faith belief that the facts he or she is reporting are accurate. He is not in good faith if he knows that a reported fact is untrue.

In case of doubt, corresponding facts are not to be presented as fact, but as assumption, evaluation or as statement of other persons.

It is pointed out that a whistleblower may be liable to prosecution if, against his or her better knowledge, he or she alleges untrue facts about other persons.

Protection of the whistleblower

All tips, including references to the whistleblower, are processed confidentially and within the framework of the applicable laws.

Legal restrictions

The laws in some countries impose certain restrictions on reporting, such as what can be reported, whether personal data about an individual can be retained, or whether reports can be made anonymously. The relevant requirements are integrated into the digital whistleblowing system. Concerns that cannot be reported using the aforementioned reporting procedures due to such restrictions should be directed to the employee's line manager. If an employee feels that it is not possible to raise the matter locally, they should escalate it within the business unit to the local HR representative or the compliance department.

Confidentiality and data protection

All information, regardless of its truthfulness, is liable to cause serious damage to the reputation of the persons concerned, the whistleblowers and/or third parties, and the Company.

We therefore treat them with particular confidentiality, over and above the obligations arising from the data protection laws.

In addition to the processing directory, which must be kept up to date in an orderly manner, a written record must be kept of the persons who may access the notices and the associated data and what rights they have in the context of data processing. These persons must be obligated to maintain special confidentiality beyond any legal requirements.

IT and data security

IT solutions for receiving and processing notices must be reviewed and approved by the Information Security Officer (ISO), the Compliance Officers and the Data Protection Officer prior to deployment.

The minimum requirements for the scope of application of the General Data Protection Regulation are derived from Article 32 of the GDPR, the Group guidelines on IT security and data protection. Special consideration must be given to the particular sensitivity of the information and the risks to individuals and the company in the event that information-related data becomes known.

Deletion concept

The deletion of data in the digital whistleblower system must be carried out exclusively in accordance with the respective time specifications of the deletion concept or after deletion approval by two separate users (dual control principle).

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