

Whistleblower System of KIRCHHOFF Ecotec-Group

Our corporate culture is characterized by responsibility and mutual respect towards our employees and business partners. Therefore, compliance with laws and internal regulations has the highest priority. To be able to remedy grievances and effectively prevent damage to KIRCHHOFF Ecotec-Group, our employees and business partners, we rely on your help that potential violations of laws, internal regulations and human rights or environmental risks being reported to us immediately.

A Whistleblower System is available for this purpose. Suspicion of possible violations of laws, internal regulation or risks in the KIRCHHOFF Ecotec-Group or along the value chain can be reported through the following channels:

- Compliance Hotline: +49 (0) 6131 887 - 270
- Compliance Mail: compliance@zoeller-kipper.de
- Personal Interview or video conference (by appointment)
- Post (also anonymous without sender) to:

ZOELLER-KIPPER GmbH – Compliance Team

Hans-Zoeller- Str. 50-68, 55130 Mainz

In addition, whistleblower can contact external institutions, such as authorities.

Process description

The KIRCHHOFF Ecotec-Group's Whistleblower System is available for reporting violations of laws and internal regulations as well as other violations in the company or along the supply chain. Violations can include, for example, bullying, discrimination, financial losses, or reputational damage due to criminal offences such as bribery, embezzlement, fraud, tax offences or antitrust violations, with human rights or environment-related risks such as non-compliance with labour standards along the supply chain.

Information for reporting

Essential information for the processing of the report are:

- Description of facts
- Location/ Place
- Time, timeframe
- Affected / aggrieved person / Company
- Responsible person / Company
- (Supporting documents / receipts)

Confidentiality is maintained throughout the entire process. In this respect, the Compliance Team treats the identity of the whistleblower and all persons named in the report as confidential. The identity is only disclosed to the persons responsible for receiving report or for taking follow-up measures. In accordance with legal requirements, whistleblowers are also protected from disadvantages, such as discrimination, denial of promotion or submission of a negative evaluation or dismissal because of the report. Even the threat of such discrimination is prohibited. Preventing a whistleblower from making a report or breach of confidentiality will also not be tolerated and sanctioned. This protection does not apply, if the whistleblower has reported false information, on purpose.

The effectiveness of the procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments are made to the procedure or corrective measures are taken.

Procedure

a. Whistleblower

The whistleblower observes a possible violation in connection with the KIRCHHOFF Ecotec-Group.

b. Reporting

The potential violation can be reported through the following channels: by telephone, mail, post, in person or by video conference.

c. Receipt of a notice

Compliance Team receives the report. Only the person who receives the report has access to the content of the report itself.

This person documents the suspicious activity report. Receipt will be confirmed within seven days.

d. Plausibility check

The suspicious activity report will be checked by the Compliance Team for plausibility and whether it falls within the scope of the laws (Whistleblower Protection Act, Supply Chain Act).

If the suspicious activity report proves to be implausible or does not fall within the scope of

the laws, the procedure ends. In the event of a rejection, the person providing the information will receive an explanation.

Following measures

A clarification of the facts (e.g., internal investigation) will be conducted. The contact person discusses the facts of the case with the whistleblower in order to gain a better understanding of the facts and to find out the whistleblower's expectations with regard to possible preventive or remedial measures. Follow-up measures will be defined.

e. Conclusion

Prevention, sanction and remedial measures will be taken to prevent future violations. The whistleblower receives feedback within three months.

Further Information

Time for the assessment depends on the complexity of the case. The Compliance Team conducts the verification of the incident report. Alternatively, the report will be forwarded to the foreign subsidiary concerned for further action.

First, the Compliance Team checks the validity of the report. Therefore, it examines whether there are sufficient indications of a violation of laws and internal regulations based on the explanations and whether further investigation is permissible (after legal assessment and in compliance with data protection regulations). The presumption of innocence applies to suspects until proven otherwise. If the suspicious activity report proves to be implausible, the examination by the Compliance Team ends. If there is an initial suspicion, the Compliance Team examines which following measures are necessary in the individual case for further action, e.g., an internal investigation, external support from authorities, etc. Impartiality and compliance with data protection and labour law requirements are ensured throughout the entire investigation. The whistleblower will receive feedback on the facts of the case within a reasonable period, at latest 3 months.

Unless longer required by law, the documentation will be deleted 3 years after closing of the proceedings. Further information on the processing and storage of personal data can be found in the data protection information sheet.

Should proceedings arise, the place of jurisdiction for all disputes shall be Mainz or the location of the subsidiary concerned.