

Rules of Procedure

Sanner Whistleblower System

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At Sanner, one of the fundamental principles is compliance with the applicable laws and regulations. If there is any doubt as to whether their own actions or the actions of third parties violate applicable regulations and laws as well as the Sanner Code of Conduct, Sanner employees, business partners and other third parties can report information related to this while maintaining confidentiality via the Sanner Whistleblower System.

Information on submitting tips

Who can use the Sanner Whistleblower System?

All Sanner employees, business partners and third parties worldwide.

What can be reported?

Violations against laws, the Sanner Code of Conduct or Sanner internal regulations as well as other grievances within the company or along the supply chain.

Which reporting points are available for the submission of possible tips?

Tips can be easily submitted and, upon request, also anonymously, via an **electronic whistleblower system** so that they are non-traceable.

In addition, employees can contact their manager, employee representatives, HR department employees as well as external reporting agencies, e.g., in Germany, the Federal Office of Justice, the Federal Financial Supervisory Authority and the Federal Cartel Office.

Business partners and other third parties can also send tips to the following email address: Compliance@sanner-group.com or directly to external reporting agencies.

In which languages can I submit a tip?

The Sanner Whistleblowing System is available in German, English, Hungarian and French.

What information should be included in the report?

- What happened? (Description of the facts)
- Where did it happen? (Site, department, etc.)
- When did the incident occur? (Date or period, time)
- Who are the data subjects or injured persons or groups of persons? (Name(s), number, etc.)
- Who could be responsible for the grievance? (Name(s), department, position, Sanner company, business partner, etc.)
- Is there evidence? (Verification documents, photos, videos, etc.)

How am I protected when submitting a report?

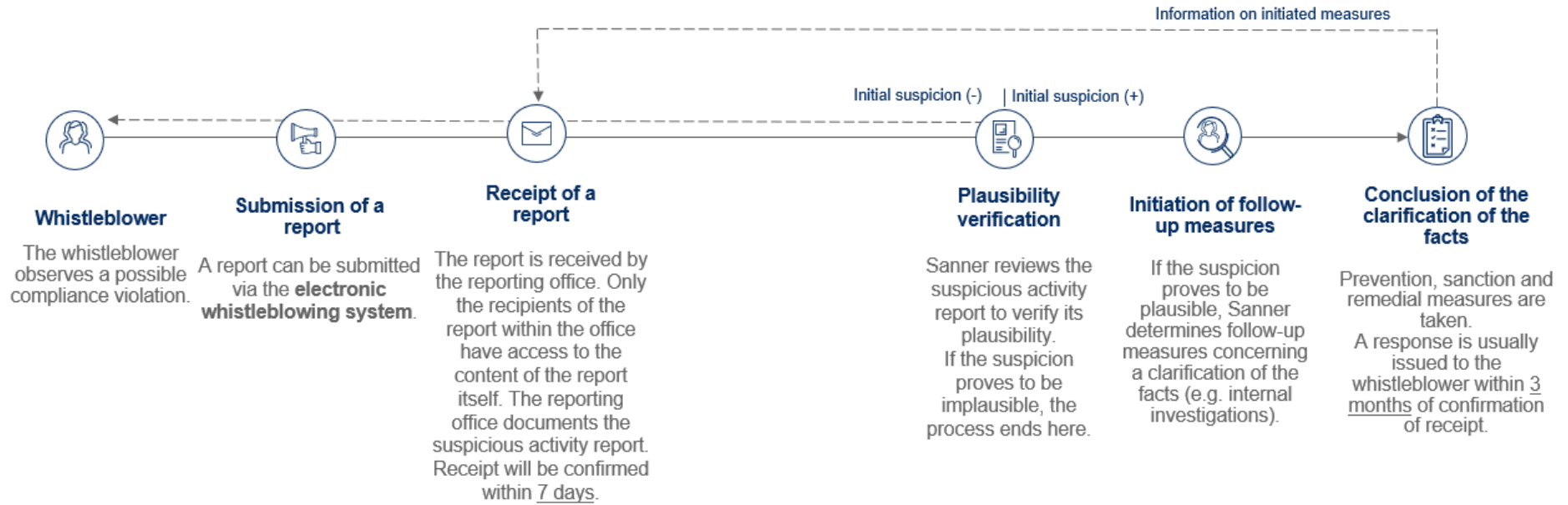
Confidentiality is maintained throughout the process. With each report, the reporting office shall treat the identity of the reporting person, the persons who are the subject of a report, and other persons named in the report with confidentiality. The identity will only be known to the persons who are responsible for receiving reports or for carrying out follow-up measures.

In accordance with the legal specifications, whistleblowers are also protected against reprisals and disadvantages, that can, for example, take the form of discrimination, refusal of a promotion or submission of a negative assessment, termination or similar behaviour on the basis of the report. The threat or attempt of such discrimination is already prohibited. In addition, the prevention of a report submission or a violation of the promised confidentiality of the identity of whistleblowers will not be tolerated or sanctioned.

This protection will not be provided if the whistleblower has demonstrably intentionally reported false information via the Sanner Whistleblower System.

Process of the procedure

Procedure description



Further information about the method

How long does a report review take?

The duration of the review depends on the scope and complexity of the facts and can last from a few days to several months.

How is the tip reviewed?

First, Sanner checks the plausibility and validity of the report. This examines whether there are sufficient indications of a violation of the rules on the basis of the statements and whether further clarification measures are therefore permissible after legal assessment and under consideration of data protection regulations.

For suspects, the presumption of innocence applies until proven otherwise. If the report of suspicion proves to be implausible, thus eliminating an initial suspicion, the review will be suspended. If there is an initial suspicion, the necessary follow-up measures for further action are determined in each individual case, e.g. an internal investigation, the use of external support, etc.

Impartiality and compliance with data protection and labour law requirements are ensured throughout the entire process for the clarification of the facts.

As a whistleblower, do I receive information on the status of my report?

The whistleblower will be given feedback on the progress of the report within a reasonable period of time. This feedback is usually given by the office to which the tip was submitted after 3 months. In cases requiring more extensive processing, the period is 6 months. Reasons for an extension of the deadline will also be communicated to the whistleblower. The feedback also contains information on the follow-up measures taken as well as a corresponding justification.