

Whistleblower System of ZÖLLER-KIPPER GmbH

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 ZÖLLER-KIPPER, our employees and business partners, we rely on your help to report potential violations of laws or internal regulations. A Whistleblower System is available for this purpose. Employees, temporary workers, and business partners can report a suspicion of compliance violations committed by employees or temporary workers in connection with their employment through the following channels:

- Compliance Hotline: 06131 887 - 270
- Compliance Mail: compliance@zoeller-kipper.de
- Personal Interview or video conference (by appointment)
- Post (also anonymous without sender) to:

ZÖLLER-KIPPER GmbH – Compliance Team

Hans-Zöller- Str. 50-68, 55130 Mainz

In addition, whistleblower can contact external reporting bodies, such as authorities.

Process description

Violation of laws and company internal rules might happen – sometimes with profound consequences for the company and the employees involved. ZÖLLER-KIPPER's Whistleblower System is available to employees, temporary workers, and business partners 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, non-compliance with labour standards along the supply chain.

Information for reporting

- Description of facts
- Location/ Place
- Time
- 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.

Procedure

a. Whistleblower

The whistleblower observes a possible compliance violation.

b. Reporting

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

c. Receipt

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 Whistleblower Protection Act. If the suspicious activity report proves to be implausible or does not fall within the scope of the Whistleblower Protection Act, the procedure ends.

e. Following measures

A clarification of the facts (e.g., internal investigation) will be conducted. Follow-up measures will be defined.

f. 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. 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 person providing the information will receive feedback on the facts of the case within a reasonable period, at latest 3 months.

Should proceedings arise, the place of jurisdiction for all disputes shall be Mainz.