


Document Name Hinweisgeber Policy	Created By: B. Hensgen	Approved By /Date B. La Gaetana	 Aqseptence Group
Document Version 01	Checked By: Th. Jacobi	Issue Date	

Hinweisgeber Policy

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Zusätzliche Informationen / Additional information:

Valid for:
All Entities


Anhang / Appendix:

Status:
Valid

Revision History

Rev.	Revision Date	Created by	Approved by	Description
001	17.12.2021	Hensgen	La Gaetana	Initial Document
	Description latest Revision:			

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Whistleblowing Policy

I. Goals

The whistleblower system is intended to enable employees and business partners to report possible misconduct through internal reporting channels.

The system described below is intended to

- enable and encourage reporting of misconduct,
- support and protect the whistleblower and other parties concerned,
- ensure that tips are followed up quickly and professionally,
- improve the structure and culture of the organization, and
- reduce the risk of misconduct.

II. Scope of application

The internal whistleblower reporting system is available to all whistleblowers. This mainly includes employees and business partners, but other persons may also use the whistleblower system, such as self-employed persons, shareholders, administrative, management and supervisory bodies, volunteers and interns, and persons working under the management and supervision of contractors, subcontractors and suppliers. Whistleblowers may also be persons whose employment relationship has already ended or which has not yet begun.


The same applies to intermediaries (natural person who assists a whistleblower in the reporting process in a professional context), third parties related to the whistleblower who could suffer reprisals in a professional context (e.g. colleagues or relatives), and certain legal entities related to the whistleblower.

III. What violations can you report?

You may report to us violations that are subject to criminal penalties or fines and other violations of laws and legal ordinances. In particular, the following areas are worth mentioning:

- Environmental protection, consumer protection
- Data protection and data security

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- Product safety and conformity
- Corporate income tax
- Competition law
- Money laundering, financial services
- Procurement
- Etc.

This includes not only positive knowledge of violations, but also reasonable suspicion of actual or potential violations that have occurred or are likely to occur within the Aqseptence Group, as well as reports of attempts to conceal such violations.


IV. Reporting channels

Circumstances that indicate a violation of our internal guidelines (e.g. Code of Conduct, Corporate Governance Guideline) or legal regulations can be reported to the following persons or bodies:

- Manager,
- Chief Compliance Officer,
- Employees of Compliance and Legal,
- Responsible HR manager,
- Whistleblowing hotline
Tel.: +49 (0) 6120 28 2299
E-Mail: compliance@aqseptence.com
- Works Council

The report is possible in writing or verbally, if desired by you also in a joint conversation at a meeting. Your information will be treated confidentially. No person reporting a suspected violation will be subjected to retaliation because of a report. We prefer that you identify yourself when reporting suspected violations to allow investigators to contact you if further information is needed. In every case, we will do our best to respect a request to keep your identity confidential. We do this to encourage employees to come forward. However, we cannot guarantee confidentiality of your identity in some instances such as a request by governmental authorities, your testimony, or other legal proceedings.

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If you would like to submit the report anonymously, this is also possible. In this case, we recommend calling +49 (0) 6120 28 2299 or using the e-mail address compliance@aqseptence.com.

We strongly encourage employees to voluntarily report their own errors. A voluntary report demonstrates the kind of integrity and character we expect of all employees. If you are involved in a violation, your reporting of it, the degree of your cooperation, and whether the violation is deliberate or unintentional will be considered in any resulting disciplinary action. An unintentional error made in good faith that is voluntarily and promptly reported is unlikely to be punished, and your prompt report may help avoid more serious problems for yourself and the Company.

V. Procedure of the examination

Your report, if not submitted directly to one of the Compliance Officers, will be forwarded to the Legal Department, which is jointly responsible for compliance tasks.

The identity of all persons affected by a report, including you and any other persons involved, remains confidential for the duration of the internal reporting process, and unauthorized employees are not permitted to access it.


Within seven (7) days you will receive a confirmation of receipt of your report. This is only not possible in the case of an anonymous report without contact options.

The Legal Department will remain in contact with you, request further information if necessary, and provide feedback. All of this is impossible in the case of an anonymous report without contact options, so that the communication of a contact option is requested. This can be made anonymous, for example, by using an e-mail address that does not contain a name.

Feedback on follow-up action will be provided within a reasonable timeframe based on the seriousness of the suspicion but also the difficulty of the investigation, but no later than three (3) months after acknowledgement of receipt. If, for whatever reason, you have not received acknowledgement of receipt of the report, the time limit will expire three months after the expiration of the seven-day period following receipt of the report.

Prior to an internal investigation, an assessment of the validity is made by examining or evaluating the allegation. Therefore, not every (anonymous) tip must be followed up, as otherwise there would be a risk of denunciatory reports and an

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overload of reporting offices. The presumption of innocence applies. Should this examination confirm the allegation as a possible violation, an internal investigation will take place. The first step in this process is to conduct research and plan the measures necessary for this particular case of investigation. This may also include the involvement of third parties professionally bound to secrecy, such as external lawyers, tax consultants or auditors. Subsequently, the investigation is carried out and an investigation report is prepared. If the investigation reveals violations or deficiencies in the internal guidelines, disciplinary measures or other remedial actions are then implemented. In the process, employee rights are always protected, the co-determination rights of the works council are observed, and data protection is complied with.

All reports are documented. The legal department stores all documents in a system that cannot be viewed by other employees. The documentation includes the notification with all documents submitted.

In the case of reports made by telephone or by other means of voice transmission, documentation is provided in the form of a record of the conversation made by the employee responsible for processing the report. In this case, you are given the opportunity to check, correct and confirm by signature.

If you call the Whistleblower Hotline, your message will be saved on the answering machine as an MP3.


If you ask for a personal meeting to report a violation, the documentation can be made - in case of your consent - by complete and accurate recording. Also possible is an accurate protocol of the meeting made by the responsible employee. In this case, you must also be given the opportunity to review, correct and confirm by signature.

VI. protection against reprisals

In the event of a report of violations, including reasonable suspicion, relating to actual or potential violations that have occurred or are reasonably likely to occur within the Aqseptence Group, as well as attempts to conceal such violations; you are protected from retaliation, including threats of retaliation. In particular, the following actions are prohibited as "retaliation" for your reporting:

- Suspension, termination or similar action;
- Downgrading or denial of a promotion;
- Transfer of duties, change of work location, reduction in salary, change in working hours;

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- Refusal to participate in continuing education;
- negative performance appraisal or issuance of a poor job reference;
- Disciplinary action, reprimand, or other sanction, including financial sanctions;
- Coercion, intimidation, bullying or exclusion;
- Discrimination, disadvantageous or unequal treatment;
- Failure to convert a fixed-term employment contract into an employment contract of indefinite duration in cases where the employee had a right to expect to be offered an employment contract of indefinite duration;
- Non-renewal or early termination of a fixed-term employment contract;
- Harm (including damage to reputation), especially on social media, or causing financial loss (including loss of orders or revenue);
- Recording of the whistleblower on a "black list" on the basis of an informal or formal sector- or industry-specific agreement, with the consequence that the whistleblower no longer finds employment sector- or industry-wide;
- early termination or cancellation of a contract for goods or services;
- Withdrawal of a license or permit

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