

Whistleblower process

Corporate responsibility and acting in accordance with the law are our highest priorities. That is why we have established a process which allows all of our employees to submit tips if they become aware of or suspect that legal violations are occurring within the company. With this whistleblower process, we ensure that we are able to follow up on incoming tips in a transparent and fair way, and that individuals who submit tips never need to fear reprisal.

The process is based on the German Whistleblowing Act (Hinweisgeberschutzgesetz). The text of the Whistleblowing Act is available at the following link: <https://www.gesetze-im-internet.de/hinschg/HinSchG.pdf>.

1. Who can submit a tip?

The whistleblower process is open to all of our employees, including employees who work with customers, employees at our administrative and branch offices, trainees, and freelancers. This text uses gender-neutral pronouns. These are intended to refer to persons of all genders.

2. What can be reported?

Information regarding legal violations can be reported – including suspected or potential legal violations. These can be violations committed by us as a company or by individual persons acting on behalf of our company. This includes, in particular, violations of criminal or administrative fine provisions, as well as violations of other federal, state or European laws. Section 2 of the Whistleblowing Act regulates the individual types of legal violations that are covered.

3. To whom can tips be reported?

Internal or external reporting offices can receive tips.

Our internal reporting office can be contacted

- via email to hinweisgeber@pieninggmbh.de,
- by telephone 05205-1004-350 or
- by mail to Piening GmbH, Hinweisgebermeldestelle, Altmühlstr. 30, 33689 Bielefeld.

The German Federal Office of Justice has established an external reporting office. Further information on how to contact the office is available on its website, currently at <https://www.bundesjustizamt.de/DE/MeldestelledesBundes/Kontakt/Kontakt.html>.

4. How can I submit a report?

To ensure your tip is processed correctly, it is important to provide all pertinent information and to describe the (potential) legal violation as precisely as possible. Tips can also be submitted anonymously. We assure that we will treat even tips which are not submitted anonymously as strictly confidential in accordance with the regulations of the Whistleblowing Act and of data privacy law, and that your identity will not be disclosed by the person processing the tip at the reporting office (for further details, see point 7).

In case of an anonymous tip, of course, we are not able to confirm receipt of the tip, discuss it with the whistleblower, or inform the whistleblower about the results of the process or any measures that have been taken.

5. Who processes incoming tips?

We ensure that the person entrusted with processing tips can act in an independent manner free from any instructions, that they are strictly obligated to maintain confidentiality, and that they have appropriate professional qualifications.

6. How are whistleblowers protected?

We ensure that the identities of all whistleblowers and the identities of any persons named in a tip are kept confidential. Unauthorised persons have no access to this information. That means that such information is not transmitted to third parties. Persons entrusted with processing tips are contractually obligated to maintain strict confidentiality. All incoming tips are treated in accordance with data protection regulations and deleted after the end of the statutory terms.

Information regarding the identity of a whistleblower may, however, be forwarded to the responsible authorities if this is required due to a legal obligation or a court or official order, or if there is reasonable suspicion that a crime has been submitted.

Tips are never used as a reason to disadvantage the reporting person, or for reprisals. There is one exception from this: If incorrect or misleading information is provided and if the whistleblower acted in a manner which we can verify was grossly negligent or intentional, then legal steps may be taken against the whistleblower.

7. What happens after a tip is submitted?

After we receive a tip, the whistleblower first receives a confirmation of receipt (unless, of course, the tip was submitted anonymously). The whistleblower receives a notification on the results of the review within three months, as well as any further measures taken. This is not the case if the notification would disrupt internal investigations or impact the rights of data subjects.

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