

Procedural Guidelines Whistleblower and Grievance System

Scope

The whistleblower and grievance system can be used to submit reports and grievances of potential compliance violations or risks.

Potential compliance violations or risks in this regard include:

- unlawful acts and omissions which are subject to a penalty or fine (criminal or administrative offenses)
- environmental or human rights risks;
- violations of environmental or human rights obligations that have arisen due to business activities within the company's own organization;
- violations of environmental or human rights obligations that have arisen due to the business activities of a direct or indirect supplier of the company;
- employment discrimination;
- violations of compliance-related internal policies (= internal policies aimed at preventing or hindering criminal or administrative offenses or violations of environmental or human rights obligations).

Reports and grievances can be submitted of potential or imminent compliance violations or risks that have been committed or are imminent by

- Schwarz Digits or Schwarz Digits employees in their work activities, or
- third parties in connection with Schwarz Digits business operations.

The violation does not have to be proven beyond reasonable doubt. Reports and grievances can also be made if a whistleblower considers it probable based on facts known to them that a compliance violation will occur or perceives risks in this regard. Suspicions may also be reported as long as this is clearly stated in the report or grievances, and they relate to specific facts. Knowingly providing false information is prohibited.

Whistleblower and Grievance Channel

Reports and grievances can be directed to our Compliance Department at any time:

Schwarz Digits KG

Compliance

Stiftsbergstraße 1

74172 Neckarsulm

E-Mail: compliance-digits@mail.schwarz

Reports and grievances can also be submitted anonymously. In the case of anonymous reports or grievances, it may be more difficult to process the report or grievances if it is not possible to ask the whistleblower any questions.

Whistleblower and Grievance System - Procedure

Reports or grievances received via the whistleblower and grievance channel are handled by the Compliance Department. If contact details have been provided, a confirmation of receipt is generally sent within seven days after receiving the report or grievances. The Compliance Department assesses whether the report or grievances fall within the scope of the whistleblower and grievance system (see above). If the report or grievances concern issues outside this scope, it may be forwarded to the competent department for processing. If the report or grievances do fall within the scope of the whistleblower and grievance system, the matter is investigated, and processed in detail, including where necessary discussing it with the whistleblower and determining any appropriate measures. As a rule, the whistleblower will receive feedback within three months of confirmation of receipt, provided that this does not affect internal inquiries or investigations or the rights of legally protected persons.

All reports or grievances are processed in strict confidence. Other departments are involved where necessary in processing the report or grievances and any necessary consent of the whistleblower has been obtained. Personal data are only shared in observance of the provisions of data protection law. There are no costs for the whistleblower when submitting a report or grievances, with the exception of the usual telecommunications and, if applicable, postage costs.

Protection against discrimination and punishment

Binding internal rules ensure that whistleblowers are protected against discrimination and punishment for submitting a report or grievances.

Contact

compliance-digits@mail.schwarz