

Speaking Up Policy

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Speaking Up Policy

This Speaking Up Policy is part of the worldwide Code of Conduct and Compliance of the DMB Dr. Dieter Murmann Beteiligungsgesellschaft (DMB) and is valid for every associated company group

First and foremost

We are committed to responsible business practices, and acting in accordance with our Code of Conduct and Compliance (“Code of Conduct”) and respective relevant laws and regulations. We want to behave with integrity and treat others with respect.

During your work, you may be confronted with ethical concerns or dilemmas. If you observe something that worries you, or that seems to violate our Code of Conduct, we encourage you to speak up. We understand that it takes courage to speak up, so therefore we are committed to providing you with an easy and safe way to raise your concerns. Speaking up is an essential part that enables us to protect our people, our company values, our stakeholders and society as a whole. No one should be alone when dealing with an ethical dilemma. In this our Speaking Up Policy we explain what your options are and how you can raise your concerns.

Scope

This Speaking Up Policy describes how you can speak up about suspected severe breaches of the Code of Conduct. Furthermore, it describes the process, so that you know what to expect, and the ways you will be protected when speaking up: confidentiality, anonymity, non-retaliation. The Speaking Up Policy applies to all employees and other key stakeholders of the DMB and their associated companies.

When do I speak up?

As soon as possible, or as soon as you suspect that there has been a severe violation of the Code of Conduct or company values. We do not expect you to have all the answers, and encourage you to use what is described in the Code of Conduct and this policy as a reference point to determine if something is not right.

What should I speak up about?

Speak up about suspected severe breaches of the Code of Conduct, or, when in doubt, about anything that does not constitute ethical, compliant or lawful behaviour.

How do I speak up?

You can speak up, provide feedback or ask your questions in a variety of ways. For many matters, it can be a good first step to talk to the person involved directly. Thus, an anonymous report by using the internet based Speak Up system should not replace the direct dialogue that forms the foundation of our transparent company culture. However, we recognize that this is not always easy to do.

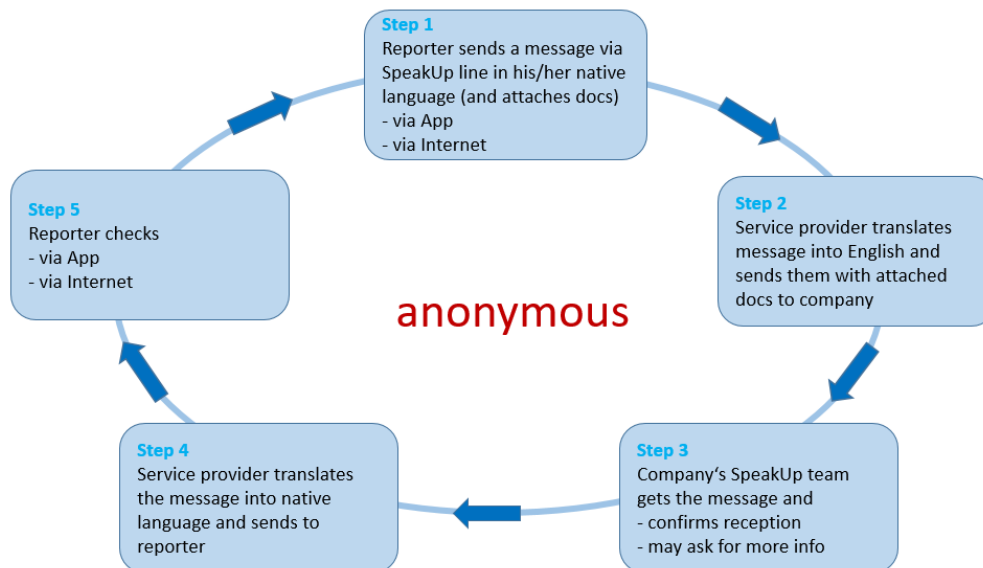
If a direct dialogue with the person involved is not possible, or if you do not feel comfortable doing so, please:

- 1 Speak up to your manager or your manager’s manager.
If this is not possible, or you do not feel comfortable doing so,
- 2 speak up to your local HR or workers’ council.
If this is not possible, or you do not feel comfortable doing so,
- 3 write an email to the compliance team, contact see page 5.
If this is not possible, or you do not feel comfortable doing so,
- 4 speak up via the internet based “Speak Up System”.

We selected this system as it allows anonymous dialogue with the reporter. It is a technical communication tool that is operated by an independent service provider and is available 24/7. By using this Speak Up line you can send a report via App or a browser in your native language. You decide to remain anonymous, or not.



Steps in the online Speak Up Portal



The Speak Up Teams

The Speak Up teams in the different DMB companies are responsible for the execution of this Speak Up policy and the internal handling of questions and Speak Up reports. The team usually is made of colleagues from the executive management and the HR department.

All reports coming in through the Speak Up line and all reports via other channels will be made available to the responsible Speak Up team. It is responsible for robust, confidential and accurate fact-finding. Speak Up teams in DMB companies have the right not to pursue a case due to limited information.

The Speak Up teams will provide a (anonymised) report to the Managing Directors of their company and to the Managing Directors of the DMB. All members of the Speak Up teams are protected against non-retaliation themselves.

I spoke up. Now what?

If you submit a report to one of the DMB companies, you will get an acknowledgement of receipt. The company's Speak Up team will evaluate and assess your report, and the appropriate course of action will be determined. Sometimes you will be asked follow-up questions. You will be informed on the status of the complaint. Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the involved parties. All parties involved, including the accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g. mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.

Protecting you as the reporter

Protecting your right to speak up is essential. Protecting you as a reporter is one of the main purposes of this policy. Below, some key principles are highlighted:

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Information will only be shared outside of this group if we are required to do so by law, if there is no other way to get further in the case, or if an important public interest is at stake.

In principle, we are obliged to inform any person under investigation that he or she is the subject of a report being investigated as soon as possible (this may be delayed if there is a substantial risk that this notification jeopardizes the investigation or the gathering of evidence.). Your identity will not be disclosed.

Regardless of all measures taken to protect your confidentiality, it can never be fully guaranteed that in a course of an investigation you will never be implicated in the case.

Solid Investigation procedures

The Speak Up teams are responsible for solid, confidential and precise fact-finding.

Anonymous

You can share information anonymously by using the internet based Speak Up Line. This offers you the best protection. The Speak Up line makes safe dialogue possible in an anonymous way.

Safeguarding your Privacy

The DMB and all its companies are committed to protecting the privacy of everyone involved in the Speak Up process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with our privacy policy and will only be used for the purposes explained in this policy or to comply with the law or an important public interest. Our service provider is GDPR & EUWBD compliant, fulfils ISO 27001, ISO 27002, ISO 27701 standards.

Non-retaliation

We encourage speaking up and any person that speaks up is protected. The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated. Any form of threat or retaliation aimed at those speaking up may lead to disciplinary measures. If you notice or experience any retaliation, you can report this via a Speak Up channel.

Protecting you, as the accused

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. The service provider and the Speak Up teams are responsible for protecting the rights of anyone who is accused – and/or otherwise involved – in any issue.

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

Solid Investigation

The Speak Up teams are responsible for solid, confidential and precise fact-finding.

Information Rights

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

Right to Defend and Appeal

After the facts are determined, the accused receives an opportunity to not only give a statement (responding to the accusations) but also have the right to comment on the draft findings. The subject has the right to appeal against the fact that he or she is subjected to during the time that the report is being investigated.

Misuse of the policy

We take the practice of reporting in bad faith or any other form of misuse of this policy very seriously. This act is considered to be a serious breach of the Code of Conduct and disciplinary actions may be taken.

Contact and links

Please find email-addresses and links for browser based messages as well as QR codes for APP based messages via the internet based Speak Up system on the homepages of the companies belonging to the DMB.