

GUIDELINE

on the whistleblower system



1. Purpose

At the **Runden Group**, we have a culture of free speech where you can share your concerns about possible illegal, unethical, or socially irresponsible behaviour without worrying about being treated unfairly. We encourage all employees of our companies who become aware of a possible violation, in particular of legal regulations, to confide in the responsible departments within our companies so that we can remedy any grievances and continue to develop ourselves and our companies successfully.

This policy sets out the framework for reporting and handling reports of possible violations. In doing so, this policy aims to take into account the legitimate interests of the whistleblower, the persons concerned, the companies and the general public. This policy is based on the requirements of Directive (EU) 2019/1937 and the national Whistleblower Protection Act (HinSchG).

2. Scope

This policy applies to all companies within the **Runden Group** and their employees.

Employees and temporary workers assigned to the employer by all companies within our group of companies are entitled to submit reports within the framework of this whistleblower system in accordance with Section 1 (3) of this policy.

3. Relevant violations within the meaning of the whistleblower system

The whistleblower system is used to receive and process reports of actual or suspected violations. The following are particularly relevant, but not exhaustive:

- Violations that are punishable by law,
- Violations that are punishable by fines, insofar as the violated provision serves to protect life, limb or health or to protect the rights of employees or their representative bodies,,

- Violations of regulations
 - to combat money laundering and terrorist financing,
 - with requirements for product safety and conformity, · with requirements for environmental protection,
 - regulating consumer rights and consumer protection,
 - protecting privacy, personal data and the confidentiality of communications,
 - and promoting the use of energy from renewable sources and energy efficiency.
- Violations of federal and uniform regulations applicable to contracting authorities regarding the procedure for awarding public contracts and concessions and regarding legal protection in these procedures once the relevant EU thresholds have been reached, as well as
- Violations of tax laws applicable to corporations and commercial partnerships, and violations in the form of agreements aimed at obtaining an abusive tax advantage that is contrary to the objective or purpose of the tax law applicable to corporations and commercial partnerships.

The whistleblower system is not available for general complaints or for product and warranty enquiries.

Only reports should be submitted where the reporting person believes in good faith that the facts reported are accurate. The reporting person is not acting in good faith if they know that a reported fact is untrue. In case of doubt, such facts should not be presented as facts, but as assumptions, evaluations or statements made by other persons.

It should be noted that a person reporting information may be liable to prosecution if they knowingly make false statements about other persons.

This policy does not oblige any employee to report information. However, if there are legal, contractual or other obligations or duties to report information, these remain unaffected by this policy.

4. Internal reporting channels and internal reporting office

If an employee wishes to report a violation, they should always first raise their concerns with their line manager. This usually allows a solution to be found on a basis of trust.

If an employee fears discrimination as a result of reporting to their superior, they can contact our internal reporting office. This is operated by a service provider and also allows anonymous reports to be made if necessary.

Our internal reporting office can be reached as follows:

Marvin Muche
hinweisgeber@runden-group.eu
+49 5492 5574248

5. Reporting procedure

The internal reporting office will confirm receipt of the report to the reporting person within seven days and check whether the reported violation falls within the scope of the whistleblower system.

The internal reporting office will check the validity of the report received, maintain contact with the reporting person and take appropriate follow-up measures if necessary.

No later than three months after confirmation of receipt of the report, the internal reporting office will provide the reporting person with feedback on their concern.

6. Confidentiality and information on data protection

Regardless of their veracity, reports are often likely to damage the reputation of the persons concerned, the person making the report and/or third parties, as well as the company. They are therefore handled responsibly and confidentially by our internal reporting office in compliance with legal

requirements. The reporting office will only use this information for the purposes of fulfilling its tasks and to the extent necessary.

The reporting of misconduct regularly involves the processing of personal data. This primarily concerns the personal data of the person reporting the misconduct and the persons accused. **Runden Group GmbH & Co. KG** is responsible for the processing of data when a report is received and processed by our internal reporting office in accordance with data protection law. Further information is available in the relevant data protection notices.

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