



Whistleblower Policy

Amann Girschbach
Status: August 2021

1. Scope and purpose

- 1.1. The Amann Girschbach Group ("Amann Girschbach") stands for integrity and responsible conduct. Compliance with laws and regulations is an important part of our managerial responsibility. As a fair business partner, we treat each other responsibly and without prejudice, both within Amann Girschbach and with respect to all external business partners and clients.
- 1.2. This Whistleblower policy describes the means by which you can report concerns about misconduct relating to any company within Amann Girschbach and how such reports are handled.
- 1.3. The policy facilitates reporting of violations of our Code of Conduct, other Amann Girschbach policies and procedures, or applicable laws, including those relating to:
 - a) Corruption/Bribery;
 - b) Fraud/Breach of trust;
 - c) Ethical misconduct;
 - d) Discrimination/Harassment/Mobbing;
 - e) Other serious infringement of laws.
- 1.4. Accordingly, reports could also relate to any suspected infringement of European Union laws in the fields of public procurement, financial services, products and markets, product safety and compliance, transport safety, protection of environment consumer protection and protection of privacy laws.
- 1.5. This Whistleblower policy applies to all directors, officers and employees of Amann Girschbach and to any third parties having a business relationship with us.
- 1.6. The Whistleblower policy builds on, and is in addition to, the Amann Girschbach Code of Conduct.

2. Reports

- 2.1. Amann Girschbach requires its directors, officers and employees to report suspicions or concerns that the Code of Conduct, other Amann Girschbach policies and procedures, or applicable laws are not being observed.
- 2.2. Amann Girschbach always encourages the free exchange of views across all organizational levels. If you wish to raise a concern, please use the normal reporting channels; namely, your direct manager or your HR contact.
- 2.3. If you are a customer, supplier or other third party, please discuss the issue with your business contact in Amann Girschbach.
- 2.4. Only if you believe the matter cannot be dealt with through customary reporting procedures (e.g. as set forth in the Anti-Corruption-Policy) you should use the Whistleblower channel to file your report.



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- 2.5. Our Whistleblower channel is hosted by an independent third party. Reports through this channel can also be made anonymously. You can access our Whistleblower channel on the following link: [Amann Girschbach Whistleblower Channel](#).
- 2.6. On request and within a reasonable timeframe, you could also meet up physically with our Compliance Office and share your information in person.
- 2.7. If possible, the report should contain as much information as possible - including all relevant names, dates, locations, etc. The earlier a concern is raised, the easier it is to take effective action.
- 2.8. Reports will be treated confidentially and sensitively, with due regard for the need to conduct an appropriate investigation and the need to comply with applicable law.
- 2.9. Reports may be submitted anonymously, although this may impede the investigation of the complaint.
- 2.10. Compliance Office will notify the Amann Girschbach AG Board of Directors of the report. In doing so, Compliance Office will not disclose any information that would allow the reporting person to be identified. The Amann Girschbach AG Board of Directors may only request information about the identity of the whistleblower if this is necessary for the further investigation or is otherwise provided for by law.

3. Investigations

- 3.1. The Compliance Office and CFO of Amann Girschbach AG are responsible for investigating and resolving the reported complaint of violations.
- 3.2. They may delegate the investigation to an internal or external investigator at their discretion.
- 3.3. The appointed member will within seven days acknowledge to reporter receipt of the report. It will then diligent follow-up on the report and maintain communication with reporter. He will thus ask for further information, if required and provide feedback to that reporting person within three months from the acknowledgement of receipt of report, at the latest. The degree of detailedness will depend on the specific case and progress of investigations. Reporter should understand that the appointed member is not in any case in the position to disclose all information since this might frustrate investigations.

4. Reporting in bad faith

- 4.1. The information to be reported can lead to the initiation of internal investigations as well as investigations by public authorities and other consequences. For this reason, only information that is true to the best of reporters knowledge to be shared. There will be significant consequences for the knowing submission of false or misleading information. The knowing dissemination of false information is a criminal offence in many countries.
- 4.2. Reports made in good faith and to reporters best knowledge will not result in any negative action by the company.

5. Protecting reporters

- 5.1. Details of a report and the reporter will be disclosed only to those who need the information to investigate, or to decide upon measures to be taken following the conclusion of an investigation.



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- 5.2. The identity of anyone contacting Amann Girschbach pursuant to this Whistleblowing policy shall be kept confidential, provided that this does not hinder or frustrate an investigation. For example, the reporter may be required to provide a statement to police, other government agency or external legal counsel in connection with formal proceedings.
- 5.3. Where deemed appropriate or required under applicable law, Amann Girschbach will advise its external auditors about ongoing and concluded investigations.
- 5.4. If there is a legal obligation to communicate information to government authorities responsible for the prosecution of crimes or otherwise, the CEO/CFO will ensure that Amann Girschbach complies with this obligation.

6. Personal data

- 6.1. The report of concerns and subsequent investigations of allegations could involve the processing of personal data (names, contact details, potential information relating to criminal conviction or offences).
- 6.2. Personal data at Amann Girschbach is processed in compliance with applicable data protection laws, including the European Union General Data Protection Regulations and respective case law.
- 6.3. Personal data shall be collected only to the extent required to undertake an investigation in accordance with this Whistleblowing policy and shall be disclosed only to persons involved in the investigative and decision-making process, including third party service providers. Amann Girschbach will process personal data based on overriding legitimate interests in detection, prevention and investigation of illegal activities. No automated decision-making is involved. Data will not be transferred outside the EEA.
- 6.4. Personal data will be retained only for two months upon termination of investigations or respective proceedings.
- 6.5. Employees and third parties shall have the right to access, rectify or erase their personal data, to object to this processing, to request for data portability, to withdraw any consents given by contacting dpo@amanngirschbach.com. Besides, they have the right to lodge a complaint with the competent authority. In Austria, the Austrian Data Protection Authority is competent (www.dsb.gv.at).



7. Non-retaliation

Amann Girschbach will not tolerate any form of retaliation (including threats of retaliation and attempts of retaliation) directed against anyone who raises a question or reports a concern in good faith (meaning that you had reasonable grounds to believe that the information on breaches reported was true at the time of reporting).

For the sake of clarity, Amann Girschbach will, in particular, not tolerate any form of:

- suspension, lay-off, dismissal or equivalent measures,
- demotion or withholding of promotion,
- transfer of duties, change of location of place of work, reduction in wages, change in working hours,
- a negative performance assessment,
- discrimination, disadvantageous or unfair treatment,
- harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income.

For more information on non-retaliation, please see Article 19 of the Whistleblowing-Directive (EU) 2019/1937.