

Whistleblower policy of Langmatz GmbH

1. General information

- 1) Langmatz GmbH is committed to effective compliance. One essential element of effective compliance is a whistleblower system. Langmatz GmbH would like to learn from employees, customers, suppliers or third parties of any possible violations of applicable law or internal regulations in the company in order to cease such violations where applicable so that it may conduct itself in a lawful manner.
- 2) The purpose of this policy is to establish a legally compliant framework for the provision of information on possible violations of law. At the same time, this policy aims to implement the requirements of the EU Whistleblower Protection Directive (EU) 2019/1937 in a legally compliant manner. In doing so, the interests of the persons providing the information and the persons affected by the information should also and in particular be taken into account.

2. Whistleblowers

- 1) Any person is entitled to provide information, regardless of whether they are an employee, former employee, customer, supplier or other third party.
- 2) In principle, no one is obligated to provide information. However, if there is an obligation to report misconduct due to legal, contractual or other regulations – for example due to a supplier contract or an employment contract – this obligation remains in place.

3. Internal contacts for reports

- 1) Employees of Langmatz GmbH should be encouraged to first contact their supervisor(s) if there are indications of possible violations of applicable law or internal regulations.
- 2) In addition, the Head of Human Resources and Compliance as well as the management of Langmatz GmbH serve as contacts in the event of indications of possible violations of applicable law or internal regulations.

4. External contact for reports

- 1) Employees, former employees, customers, suppliers or other third parties may also contact the external compliance ombudsman of Langmatz GmbH in the event of indications of possible violations of applicable law or internal regulations of Langmatz GmbH:

Dr Johannes Dilling, Attorney-at-Law
Landgrafenstraße 49
50931 Cologne
Germany
Tel.: 0221 933 107 40
0163 3476 111
E-mail: info@ra-dilling.de
RADilling@protonmail.com

Dr Dilling is also available for personal meetings with whistleblowers.

- 2) In addition, whistleblowers can use the whistleblower portal www.safewhistle.info to contact the compliance ombudsman. Whistleblowers can also communicate with the compliance ombudsman by telephone, fax, messenger services with secure end-to-end encryption and encrypted e-mails.

5. Reports

- 1) Indications of violations of applicable law and internal regulations of Langmatz GmbH are relevant in the sense of effective compliance. General complaints which, for example, concern the employment relationship of an employee or the services of Langmatz GmbH are not relevant.
- 2) The whistleblowers should be encouraged:
 - To report what happened, when, where, with which parties involved and which other persons, if any, may have knowledge of this and whether there are any documents on this.
 - To be available for queries and to inform the compliance ombudsman how they may contact them.
 - To give a tip-off only if the whistleblower believes in good faith that the violation they are reporting is in fact true.
 - To clearly express possible doubts by using appropriate wording such as *"I believe"* or *"possibly"*.
- 3) Anonymous reports are also accepted and processed. Whistleblowers can also demand that the compliance ombudsman does not disclose the identity of the whistleblower to Langmatz GmbH.

6. Processing of reports

- 1) After receiving a report, the compliance ombudsman shall inform the whistleblower within 24 hours that they have received the report. They then process the information and send a report to the Head of Human Resources and Compliance of Langmatz GmbH.
- 2) The Head of Human Resources and Compliance decides, if necessary together with the management of Langmatz GmbH, how to deal with the tip-off. If there are sufficiently concrete grounds for suspicion of violations of applicable law or internal regulations, these are investigated internally in order to clarify and remedy possible misconduct.
- 3) In the event of queries regarding the facts of the case, the compliance ombudsman shall attempt to contact the whistleblower.
- 4) No later than three months after receipt of the tip-off, the whistleblower shall receive feedback from the compliance ombudsman as to whether Langmatz GmbH has taken any measures in response to the tip-off and, if so, which measures.

7. Protection of whistleblowers and persons concerned

- 1) Langmatz GmbH is aware that tip-offs can have sensitive content and that, if this information becomes known, the whistleblowers, the persons concerned by the tip-offs and also Langmatz GmbH and its employees can suffer considerable, and even existential, damage. In view of this, Langmatz GmbH shall handle the information with particular care.
- 2) All information, including all references to the whistleblowers and to the persons affected by the information, shall be treated with special confidentiality and processed in accordance with data protection regulations.
- 3) Langmatz GmbH shall ensure that:
 - Only those persons receive knowledge of the information, the identity of the whistleblower and the persons concerned who process the information. It must be stipulated conclusively in writing who these persons are.
 - These persons are sworn to maintain special confidentiality and are instructed to handle the information in a particularly confidential manner, in conformity with data protection requirements and also in conformity with the law.
 - Unauthorised employees cannot access the information and the related data.
 - The confidentiality of the identity of the whistleblowers and of the persons concerned is particularly protected in all follow-up measures taken with regard to the information.
- 4) By way of precaution, it should be noted that, outside of a client relationship with a criminal defence lawyer, internal documents of Langmatz GmbH are not exempt from seizure, including those from which the identity of the whistleblowers and/or the persons concerned may emerge.

Garmisch-Partenkirchen, 27.11.2023

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