

**List of content**

1 Purpose and goal .....2

2 How you can reach us.....2

3 Approach and responsibilities .....2

3.1 Data protection, informant protection and confidentiality .....2

3.2 Protection of the accused.....2

3.3 Acknowledgement.....3

3.4 Circumstances that indicate a criminal offense .....3

3.5 Processing deadlines for compliance cases.....3

4 Documents.....4

5 Records .....4

6 List of changes .....4

## 1 Purpose and goal

The purpose of this appendix is to provide people who wish to report information about potential irregularities in our company with a guide to how this is possible, how we deal with these reports, and how we communicate in such cases.

## 2 How you can reach us

To obtain information about events that direct or indirect employees or other interested parties believe are or may be material to the company, the following channels exist to report this information to the local or global compliance officer.

- Whistleblower app (see Menshen website: [www.menshen.com](http://www.menshen.com))
- Compliance email address ([compliance@menshen.com](mailto:compliance@menshen.com))
- Telephone (directly to the Compliance Officer)
- Letter (to the attention of the Compliance Officer)

We expressly point out that, apart from the reporting channels mentioned above, there is the option of contacting the responsible authorities directly.

## 3 Approach and responsibilities

In principle, reported potential compliance cases are processed by the compliance officer at the respective location. This person is also responsible for ensuring that all reports are recorded in the compliance report and reported to the Compliance Officer of the Menshen Group.

### 3.1 Data protection, informant protection and confidentiality

Our reporting channels ensure that only those responsible for receiving and processing incidents and those who support them in completing the task(s) have access to incoming incidents.

The Compliance Officer ensures the confidentiality of the identity of the following people:

- the person providing the information
- the person(s) who are the subject of an incident
- other person(s) named in the report

The Compliance Officer entrusted with processing an incident is responsible for and ensures that the identity of the aforementioned persons is known only to them or to persons responsible for taking follow-up measures and the persons supporting them in carrying out these tasks. The requirement of identity confidentiality applies regardless of whether the Compliance Officer is responsible for the incoming incident.

### 3.2 Protection of the accused

In principle, everyone who is implicated and under investigation of a potential compliance incident is subject to the presumption of innocence. When processing a compliance case, it must be ensured that the protection of personal data is guaranteed. Furthermore, the person investigated has the right to be informed of the actions or omissions with which they are accused and to be heard at any time.

### 3.3 Acknowledgement

If the person providing the information identifies themselves with their contact details, they will receive feedback from the Compliance Officer that the report has been received. Furthermore, they will be informed about the results of the investigation and measures taken as the matter progresses, and the Compliance Officer has the opportunity to clarify any queries that may arise during processing in direct contact.

This is not possible for reports that reach us anonymously, except when using the whistleblower app (in the App only indirectly). If the informant uses the app, they can save the report number. A corresponding note is given when entering the message. This message number can be entered into the app at any time to find out about the status of processing or to provide further information.

If the Compliance Officer has any questions while processing an incident that have reached us via the app, they can document them in the App. However, it is not possible to determine whether these are read by the information provider, as the app ensures that all entries made cannot be traced back.

If information about a possible compliance incident reaches the company via those who are not officially entrusted with processing compliance incidences, the procedure will be as follows:

The Compliance Officer informs the person concerned that they are obliged to maintain absolute secrecy about this knowledge. The person instructed in this regard must sign the protocol drawn up for this conversation by the Compliance Officer. If there is a violation of the instruction to maintain confidentiality, this will have consequences under labor law.

### 3.4 Circumstances that indicate a criminal offense

If, during the processing of a compliance matter, evidence emerges and accumulates those points to a criminal offense, the responsible public prosecutor's office will be informed by the Compliance Officer.

### 3.5 Processing deadlines for compliance cases

The following deadlines apply to the processing of compliance issues.

- The Compliance Officer must confirm the receipt of the note in writing to the individual providing the information no later than 7 days after receipt.
- The investigation of each compliance case must be started not later than 15 calendar days after receipt of the information. The local Compliance Officer is responsible for documenting the receipt of the information and the start of the investigation with the date and, if possible, the time of the transaction.
- Each compliance incident must be addressed within three months. Exceptions can be made in complex cases. In such cases, the processing time can be extended an additional three months.

The informant will receive written feedback within three months. The feedback includes the notification of planned and already taken measures, as well as the reasons behind them. Feedback to the individual providing the information may only be given to the extent that this does not affect internal investigations or further investigations and does not violate the rights of the person(s) who are subject of the incident or who are named in the report.

**4 Documents**

- M01\_PI\_03\_Compliance-Management\_INT

**5 Records**

- Compliance Notes

**6 List of changes**

Date	Index	Description of the change