


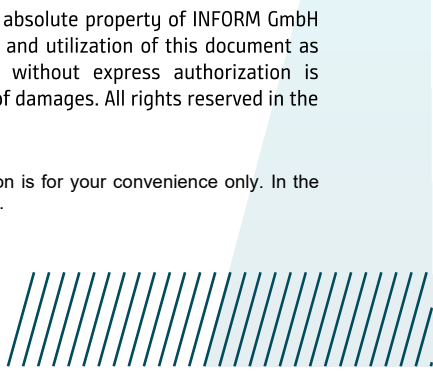
A large teal graphic element on the left side of the page, consisting of a solid teal top section, a middle section with diagonal hatching, and a solid teal bottom section.

RULES OF PROCEDURE FOR THE WHISTLEBLOWER AND COMPLAINTS SYSTEM¹

Two parallel teal lines, one light and one dark, slanted upwards from left to right.

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¹ Since these rules are subject to German law, this translation is for your convenience only. In the event of any inconsistencies, the German version shall prevail.

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At the INFORM Group, we take responsibility for respecting the law, in particular internationally recognized human rights and environmental standards, both within our company and within our supply chain.

Violations of the law - especially human rights and environmental standards - can have serious consequences for our company, our employees, our business partners and other affected parties. It is therefore important for us to identify such risks and violations at an early stage in order to initiate appropriate countermeasures and avert potential damage.

In accordance with the German Supply Chain Due Diligence Act ("Lieferkettensorgfaltspflichtengesetz" - LkSG), we have taken all necessary measures to ensure respect for human rights and environmental standards. An effective whistleblower and complaints system has been implemented to enable continuous monitoring of compliance with these rights and standards. This gives us the opportunity to report potential risks or suspicions relating to human rights and environmental aspects.

1. WHAT CAN AND SHOULD BE REPORTED?

The whistleblower and complaints system allows anyone to report human rights and environmental risks, as well as violations of human rights or environmental obligations caused by business activities within our company or in the supply chain.

Please only provide information that is relevant to the complaint.

2. WHO CAN REPORT?

Both employees of our company and third parties can submit complaints about potential risks and breaches of duty within the meaning of the LkSG.

3. HOW CAN REPORTS BE MADE?

Reports or complaints can be submitted online or by telephone via our whistleblower and complaints system, which can be accessed here:

<https://platform.confondnt.com/case/home/15/9718c7826407/>

The telephone number for telephone reports is also given there.

If you wish to meet in person or submit a report in a video conference, this can also be requested via the whistleblower and complaints system. The complaints manager will contact the reporting person to arrange a meeting or video conference.

All reports via the whistleblower and complaints system are treated in strict confidence. The whistleblower and complaints system allows for different types of reports, in which the data on the identity of the reporting person is processed as follows, depending on the type of report.

Anonymous reporting

In the case of an anonymous report, no personal data relating to the identity of the reporting person is collected (or, if it is technically unavoidable, such as the IP address, it is not stored permanently and is deleted immediately after leaving the complaints system page).

Accordingly, the reporting person cannot be actively contacted, e.g. for confirmation of receipt or queries, but communication is possible via the reporting page displayed after the report has been submitted if the reporting person remembers/saves the URL or QR code of the reporting page.

Pseudonymous reporting

In the case of a pseudonymous report, the information on the identity of the person is only transmitted to the service provider that makes the complaints system available. This service provider is Compliance.One GmbH. The service provider Compliance.One also maintains the confidentiality of the identity of the reporting person vis-à-vis our company to which the report is addressed. In this case, we can communicate with the reporting person via the service provider Compliance.One, e.g. to confirm receipt of the report, to ask questions about the reported facts and to provide feedback on the measures taken. However, we do not obtain any knowledge of the identity of the person or their contact details. The service provider Compliance.One ensures effective pseudonymization of this person's personal data.

Transparent reporting

In the case of a transparent report, our internal complaints office receives the information provided by the reporting person regarding their identity, including the contact details provided, and can communicate directly with this person.

4. WHO MANAGES COMPLAINTS?

Reports are processed by the complaints managers in our complaints office. Our complaints managers are impartial, independent experts and bound to confidentiality when processing a report.

5. HOW DOES THE WHISTLEBLOWER AND COMPLAINTS SYSTEM WORK?

A report is usually processed as follows:

Confirmation of receipt

The complaints office confirms receipt of the report within seven days.

Examination of the material scope of application

The first step is to assess whether the facts described involve human rights or environmental risks in accordance with the LkSG. If this is not the case, but the report falls under the material scope of the German Whistleblower Protection Act ("Hinweisgeberschutzgesetz" - HinSchG), the report is forwarded to the internal reporting office in accordance with the HinSchG, which then takes over the processing.

If a report falls within the scope of both the LkSG and the HinSchG, the complaints office under the LkSG and the internal reporting office under the HinSchG coordinate the processing of the report. In this case, the higher protection standards for the reporting person and the stricter regulations are applied.

In such a case, the reporting person will be informed - if possible - under which regulation their report will be processed.

If neither the material scope of application of the LkSG nor the HinSchG applies, the report will be rejected and the reporting person will - if possible - be informed of this and the reason for the rejection.

Checking the plausibility of the facts

It is checked whether sufficient information is available for further processing and whether the reported facts are plausible. If this is not the case, the reporting person is contacted - if possible - and asked for additional information and/or an attempt is made to obtain missing information elsewhere.

If the reported facts are not plausible - even after discussion with the reporting person - and/or if the facts do not give rise to sufficient suspicion of risks or violation of relevant circumstances within the meaning of the LkSG or HinSchG and/or if further processing would be legally inadmissible, the report will be rejected and the reporting person - if possible - informed of this and the reason for the rejection.

Clarification of the facts

In the case of accepted reports, internal investigations are first carried out to clarify the facts. If necessary, an independent third party is commissioned to conduct an external investigation.

If possible, the complaints office will also discuss the facts of the case with the person making the report.

Remedial measures

If a violation of human rights or environmental obligations is identified during the investigation, appropriate remedial measures are taken in accordance with Section 7 LkSG.

Based on the findings of the investigation, appropriate remedial measures are taken to respond appropriately to any identified violations or risks. This may include personal measures, the termination of relationships with business partners or the adjustment of processes.

Conclusion and review

Where possible and permissible, the reporting person is informed of the conclusion of the procedure and receives a brief summary of the results or the measures taken.

Review of the effectiveness of the procedure

The effectiveness of the whistleblower and complaints system is reviewed annually and on an ad hoc basis. In particular, feedback from the reporting persons is used for this purpose and, if necessary, adjustments are made to the whistleblower and complaints system.

6. HOW IS THE REPORTING PERSON PROTECTED FROM RETALIATION?

The protection of reporting persons against discrimination or other reprisals on the basis of reports submitted is a central component of our whistleblower and complaints system.

Reprisals against persons who report actual or suspected misconduct in good faith will not be tolerated.

7. PROCEDURAL PRINCIPLES

Confidentiality of the whistleblower and complaints system

The complaints manager treat the identity of the reporting person and the content of the reports confidentially and are obliged to maintain confidentiality accordingly. The identity of the reporting person will not be disclosed to third parties outside the complaints office, insofar as this is legally possible.

Protection against reprisals

Discrimination, intimidation, hostility or other reprisals against reporting persons and/or other persons who cooperate in investigations to the best of their knowledge and belief are inadmissible and will not be tolerated.

Interfering with or obstructing investigations, in particular influencing witnesses and suppressing or manipulating documents or other evidence, is not permitted.

Independence and impartiality of the whistleblower and complaints system

We guarantee the independence and impartiality of the complaints manager.

Fair procedure

During investigations, the applicable laws, including data protection law, as well as the relevant internal regulations and guidelines, as amended, are complied with.

Only legal investigation methods are used for investigation purposes and only legally usable information is taken into account.

Presumption of innocence

Investigations are conducted neutrally and objectively in compliance with the presumption of innocence. Just as evidence that incriminates suspects is investigated, so too is evidence that could exonerate them.

Compliance with the principle of proportionality

Investigative measures comply with the principle of proportionality, i.e. they must be suitable, necessary and appropriate to fulfill the purpose of the investigation.

Data protection

The investigation of a complaint will be conducted in accordance with applicable data protection laws, including the retention and deletion of data and international data transfer regulations.

Version 1.0

Aachen, January 16, 2024

Imprint
INFORM Institut für Operations Research und Management GmbH
Pascalstr. 35
52076 Aachen

Tel.: +49 (0) 24 08 / 94 56 - 0
Fax.: +49 (0) 24 08 / 60 90
E-mail: info@inform-software.com