

# RULES OF PROCEDURE WHISTLEBLOWER PROTECTION ACT



of

KEB Automation KG  
Südstraße 38  
32683 BARNTRUP  
DEUTSCHLAND

including all its affiliated companies

– hereinafter the „KEB Group“, „KEB“ or „we“ –



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## Preamble

The KEB Group is a global provider of drive and automation solutions for various industries and applications. Our aim is to ensure that decisions are in line with laws, internal regulations, and values. We are aware that, despite our efforts, it is possible that a grievance, breach of law or rule may occur. We have set up a whistleblower system to identify such cases and address them appropriately.

## § 1 Scope of application

The whistleblower system can be used for all hints relating to grievances, violations of laws or regulations in connection with our business activities. The whistleblower system can be used by both internal and external stakeholders, e.g.:

- Employees of KEB or our affiliates;
- Employees of our suppliers, business partners or customers;
- Representatives of trade unions, non-governmental organizations, media, or other interest groups;
- Individuals or communities who are or feel affected by our products, services or activities.

The whistleblower system is not intended for the following cases:

- Requests, suggestions or feedback about our products, services or activities that are not related to human rights or environmental risks or breaches of duty;
- Complaints or reports that are manifestly false, malicious, or abusive.

## § 2 Whistleblowing Channels

Hints or complaints can be entered into the procedure via the following channels:

- By telephone on +49 (0) 5263 401-688 or +49 (0) 5263 401-229. The number is available Monday to Friday from 9:00 to 15:00. The usual telephone charges apply.
- By e-mail via [whistleblower@keb.de](mailto:whistleblower@keb.de).
- In person to the person responsible. The contact details can be found on our website [[www.keb-automation.de](http://www.keb-automation.de)] under the menu item "Whistleblower Contact". The person responsible is also available on request for personal reports and meetings at the branches.

We recommend submitting hints in writing to provide a clear and complete account of the facts. Please provide the following information:

- A brief description of the facts, including the individuals, organizations or locations involved, the nature and extent of the adverse impact, and any evidence or sources supporting the facts;
- An information whether the matter has already been reported to other bodies or whether other procedures or measures have been or will be initiated;
- An explanation of the whistleblower's expectations or demands of KEB or proposed solutions;

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- An indication of whether the whistleblower wishes to remain anonymous or whether he/she consents to being contacted by the persons named under § 4. If yes, please provide contact details (name, telephone number, e-mail address).

We treat all hints confidentially and respect the privacy of the persons making them. We do not pass on any personal data to third parties without the consent of the person concerned, unless we are legally obliged to do so, or it is absolutely necessary for the implementation of the procedure. Data that allows conclusions to be drawn about the identity of the whistleblower will not be passed on to the KEB.

## § 3 Procedure of the whistleblower procedure

The whistleblower procedure is as follows:

We confirm receipt of a hint within a reasonable period, usually within five working days. We check whether the hint falls within the scope of the procedure and whether it contains sufficient information. If not, we will ask the person providing the information for further details. If no further information can be provided or no contact can be established with the whistleblower, the procedure will be closed. The whistleblower will be informed of this, stating the reasons, provided the relevant contact details are available.

We are open to any questions, comments, or suggestions that the whistleblower may have during the proceedings.

We investigate the facts and collect all relevant information and evidence. If necessary, we interview the persons or organizations concerned or consult external experts or mediators. We assess whether and to what extent KEB is (co-)responsible for the negative impact and whether we have breached our obligations. We will prepare a report summarizing our findings and conclusions. This step should be completed within three months.

- **Solution and remedy:** We communicate our findings and our proposed solution to the whistleblower. We strive to find a solution that considers the interests and needs of all parties involved. We involve the whistleblower appropriately in the process.
- **Conclusion and follow-up:** We conclude the procedure. The whistleblower is given the opportunity to provide feedback on the conclusion of the procedure and its outcome. We regularly check whether the agreed measures are effective and whether further steps are required. We prepare a final report documenting the progress and outcome of the procedure.

The effectiveness of the whistleblower system is reviewed on an event-related basis, but at least once a year.

## § 4 Responsible persons

The persons responsible for the whistleblowers are:

Sebastian Adloff  
Legal Department  
+49 5263 401-688  
whistleblower@keb.de

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as well as representative

Benjamin Rekate  
Legal Department  
+49 5263 401-229  
whistleblower@keb.de

## § 5 Protection from discrimination or punishment

We ensure effective protection against detriment or punishment based on a hint by taking the following measures:

We protect the identity and personal data of whistleblowers unless they expressly consent to disclosure, we are required to do so by law or disclosure is necessary to mitigate the risks. We prohibit any form of discrimination, punishment or retaliation against whistleblowers or others involved in or supporting the process. We take appropriate disciplinary action against employees who violate these principles or attempt to influence or obstruct the process.

## § 6 Additional external reporting offices

In addition to the internal reporting office, there are other external reporting offices:

- External reporting office of the Federal Government, at the Federal Office of Justice (Bundesamt für Justiz)
- External reporting office of the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht)
- External reporting office of the Federal Cartel Office (Bundeskartellamt)

## § 7 Data protection & Disclaimer

We ensure that the legal and data protection requirements are complied with. The personal data includes only the identity, function and contact details of the persons providing or affected by the hint, as well as the other personal data that is absolutely necessary to clarify the facts of the case. In addition, only the reported facts, the processing steps, the follow-up of the report and the results of the investigation are stored. The personal data collected in the course of hints and investigations will be deleted after three years from the end of the investigation. This period may be extended if the investigations are followed by further proceedings in which the data is required.

The complaints procedure does not serve to enforce individual rights. Consequently, it does not constitute a negotiation that suspends the statute of limitations within the meaning of § 203 BGB under German law or a regulation of the law applicable to claims for damages.