



WITTENSTEIN

Principles for submitting reports, processing reports and protecting persons making a report ("Principles of reporting")

1. Principles

- Sustainable business success at home and abroad is only possible with strict compliance with the respective legal system. We demand full compliance with applicable laws, human rights and environmental and social standards from all employees, the entire management team and all our business partners.
- We take reports indicating a violation of legal and/or company regulations very seriously.
- Reporting violations of legal and/or company regulations not only helps to uncover possible current violations, but also to prevent future violations and thus avert damage to WITTENSTEIN.
- We provide various reporting channels, both personal and anonymous.
- We do not discriminate against anyone who reports violations to the best of their knowledge and belief.
- For details, please refer to our [Code of Conduct](#).

2. Reporting

- **Who?**
 - Any person who has become aware of a potential violation of legal and/or company regulations can submit a corresponding report.
 - Any person means that both employees and external parties can report a potential violation. External parties may be employees of business partners, for example, but also completely uninvolved third parties.
- **What?**
 - Potential violations of legal and/or company regulations can be reported.
 - A suspicion of a potential violation is sufficient for a report.
 - Examples of potential violations:
 - Violations of cartel and competition law
 - Matters relating to bribery and corruption
 - Human rights violations
 - Environmental violations
 - Violations relating to money laundering or terrorist financing
 - Violations of product safety and conformity requirements
 - Violations of quality and safety standards
 - Violations by our business partners in connection with their activities for WITTENSTEIN, e.g. violations of our [Supplier Code of Conduct](#) can also be reported.



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➤ **How?**

- [WITTENSTEIN - Reporting System](#)
This reporting system can be used to submit reports 24/7 worldwide in various languages.
Secure communication with compliance organization is ensured by means of a mailbox.
When creating a report, please follow the instructions in the system, which will guide you through the process step by step.
Persons submitting reports can do so anonymously or can give their name.
- In person
By prior appointment via compliance@wittenstein.de
- By phone
Reports can be submitted in German or English on +49 7931 493 18520 during normal business hours.
In addition, reports can be submitted via our [Compliance Officer in the respective country](#).
- By email
compliance@wittenstein.de
- By mail
WITTENSTEIN SE, Compliance Officer, Walter-Wittenstein-Straße 1, 97999 Igersheim, Germany
- Anonymously
Anonymous reports can be submitted via the [WITTENSTEIN - Reporting System](#).
Reports can be submitted 24/7 worldwide in various languages, provided this is permitted by national law.

3. Processing of reports

- Receipt of a report is confirmed in the reporting channel selected by the person making the report. The respective time periods are observed, which may vary from country to country. In Germany, confirmation of receipt of a report is issued after seven days at the latest.
- Receipt of a report is documented.
- As part of the processing of a report, the validity of the report received is checked in consultation with the relevant specialist departments. If necessary, questions are asked to the person making the report. Furthermore, depending on the individual case, appropriate measures are defined and implemented to remedy the reported violation and to prevent similar cases from occurring in the future.
- As long as a violation has not been proven, the presumption of innocence applies. Incriminating and exonerating facts are equally included in the investigation.
- The person making the report will receive a response regarding the current processing status as well as regarding measures already taken and measures still to be taken within the legally prescribed period in the various countries, provided that this does not affect internal inquiries or investigations and provided that this does not affect the rights of the persons who are the subject of a report or who are named in a report. In Germany, the deadline for a response is three months.



WITTENSTEIN

- If a violation of legal and/or company regulations is ascertained, this violation will be remedied immediately. Measures will be taken to prevent such violations in the future.

4. Protection of persons making a report

- Persons who report any violations of legal and/or company regulations to the best of their knowledge and belief shall not suffer any disadvantages as a result of their report.
- If the person making a report is put at a disadvantage, this is a violation of the [Code of Conduct](#) of the WITTENSTEIN group and, where applicable, against applicable law and may be subject of a separate report.
- However, a deliberately false report, e.g. in order to unjustifiably arouse suspicion about colleagues, can lead to negative consequences for the person making the report.
- The information provided by the person making the report will always be treated confidentially. The “need to know” principle is observed when processing reports. However, statutory or official notification obligations must be complied with when processing reports.
- Personal data is protected. Details can be found in the [Privacy Statement of our Reporting System](#).

5. External reporting offices

Persons making a report can also contact external reporting offices that are available for this purpose in the respective country.

In Germany, these include:

- [External Reporting Office of the German Federal Office of Justice](#)
- [External Reporting Office of the German Federal Cartel Office](#)
- [Reporting Office of the German Federal Financial Supervisory Authority](#)