

1. Introduction

The PWO Group is committed to honest and ethical conduct for all of its business activities. We support open communication and expect all of our employees to maintain high standards while complying with applicable laws and our internal code of conduct.

Nonetheless, all companies are faced with the risk that various situations will not go properly or that unlawful or unethical acts will knowingly or unknowingly be committed. A culture of openness and accountability is essential in avoiding and responding to such situations. This guideline explains how to react to suspected misconduct or dangers in the workplace and describes how to report such matters using the whistleblower portal.

2. Purpose of a Whistleblower System

The purpose of a whistleblower system is to report violations of our internal code of conduct, our business partner code of conduct and / or possible violations of the applicable laws and regulations.

A whistleblower system is an early warning system designed to prevent or at least quickly detect irregularities and / or the misconduct of individuals, entire groups or even companies as a whole, thereby avoiding serious reputational damage and financial loss.

A whistleblower system also provides greater security for whistleblowers, as no data are stored with the anonymous input of suspicions that would lead to conclusions about the whistleblower. No IP addresses are logged, no cookies are set, and no location data are retrieved. The inputs made by the whistleblower are stored and encrypted in a high-security environment. The login data with which the whistleblower can access the system is generated by the system and only visible to the whistleblower. The company does not have access to the login data.

3. Who is allowed to report indications and concerns within the company?

All persons at all levels inside and outside of the company, such as Management Board members, department heads, employees, consultants, subcontractors, trainees, full-time and part-time employees, support and temporary workers as well as external contractors (*collectively referred to herein as "persons"*) may report indications and concerns.

4. Examples of relevant incidents / irregularities

Examples include the following:

- Competitive violations, breaches of antitrust law
- Bribery, corruption
- Financial offenses, e.g., fraud, theft, embezzlement
- Occupational safety, health protection
- Data security and protection
- Discrimination, harassment and bullying
- Securities trading and insider transactions

5. Whistleblower support and protection

Employees who report a suspected violation **in good faith** need not fear any discrimination from either **PWO or third parties**, even when the suspicion is unconfirmed or proves to be false. The term "discrimination" includes dismissal, disciplinary action, threats and other negative treatment in connection with the reporting of indications and concerns.

When an employee believes that he or she has experienced such discrimination, he or she must report that incident via the whistleblower portal, to the immediate supervisor, to the Compliance Officer or to the works council.

Employees must not in any way threaten or retaliate against a whistleblower. Anyone behaving in such a manner will be disciplined.

6. False or malicious claims

PWO assumes that all reports are made in good faith.

PWO will consider **reports by employees that are knowingly false or malicious** as serious offenses resulting in disciplinary action, including dismissal or the termination of the existing contract and, if appropriate, further legal action, including but not limited to criminal proceedings or claims for damages, among other things.

7. Reporting of indications or concerns

Generally, as a company, we want our employees to express their concerns or indications openly.

At the same time, we fully understand if you prefer to protect your identity.

The web-based whistleblower system, which is protected by special encryption and security technologies, gives you the opportunity to report information both anonymously and with your personal details. All reports are received and processed exclusively by the Compliance Officer.

The whistleblower portal is available 24 hours a day, seven days a week. The portal can be used from any computer or mobile device.

The link below takes you to the whistleblower portal. This link can also be found on the PWO homepage, on the intranet and in the PWO process house.

<https://pwo-progresswerk-oberkirch.integrityline.org>

When you enter the link, you will be forwarded directly to the homepage of the whistleblower portal and can immediately start the reporting process. The system automatically guides you through all the required questions.

At the end of the reporting process, you will receive an automatically generated incident number and asked to create a password.

With the login data, you can log back into the system at any time and answer questions from the Compliance Officer about the situation you described, or you can provide additional

information about the incident yourself. The company has no access to the login data; this data is only visible to you.



Please note the incident number and the password. Further communication via the portal is important for investigating and clarifying the incident in the event of questions or further information needed. Here you can also track the processing status.

For all reports, it is important that the following questions are answered in a comprehensible manner:

Who?

Should you choose to report an indication stating your personal data, the report's sender must be clearly identifiable. Effective communication can only begin when the sender is clearly identifiable.

Should you choose to make an anonymous report, please remember to record the incident number generated by the whistleblower system and the password you are assigned, so that communication can continue to take place anonymously via the portal.

What?

The wording of a report must state the facts underlying the report. Please take into consideration that the Compliance Officer requires a full explanation of the facts. Additional information may also be needed for the report (files, documents, etc.). It is possible to upload files to the whistleblower portal.

When?

It is important to describe the facts as precisely as possible in terms of time so that responsibilities and other circumstances can be assigned. The report should be made on a timely basis (usually within a few days). There can only be a limited response to incidents occurring in the distant past.

Where?

The location of the report should be formulated as precisely as possible. If possible, please indicate the country, location, plant, division and department.



In the case of anonymous reports, the information should be precise but stated in a manner that makes conclusions about your identity difficult to impossible.

If you have any questions about the whistleblower system or the protection of your rights, please refer to the helpful FAQs on the first page of the whistleblower portal.

Alternatively, indications and concerns may be reported to the immediate supervisor or to the

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The identity of the whistleblower is treated confidentially, even when the report is made directly to the immediate supervisor or compliance officer.

8. Investigation and investigative results

Once an employee has reported his or her concern, the Compliance Officer conducts a preliminary review to define the scope of any investigation and determine whether an investigation is appropriate and how it should be performed.

Some reports may also be clarified without conducting an investigation.

The actions we take in response to a report of an indication or concern will depend on the nature of the concern and the outcome of the further investigation. The Management Board is regularly informed about indications and reports, as well as about the results of the investigation and subsequently about the measures taken.



The whistleblower may retrieve the case status or the investigation's result via the portal. Naturally, any related information is provided only in compliance with the applicable data protection regulations and other laws.

Should under certain circumstances it be necessary to involve an external institution such as a supervisory authority, the Compliance Officer will arrange for this in coordination with the Management Board.