

## **LAPP Whistleblower Procedure Code**

## **Contents**

### **1. The LAPP whistleblower procedure code**

**What is a whistleblower system?**

**What is a procedure code?**

**Since when does our procedure code apply?**

### **2. Our procedure code**

**For which type of whistleblowing can the procedure be used?**

**Who could reports of violations concern?**

**Via which channels can misconduct be reported?**

**Online reporting system**

**Compliance email**

**Compliance hotline**

**Compliance Organization**

**How will we process your message?**

**How will you be protected against discrimination or punishment due to your reporting of potential misconduct?**

**Documentation**

**Party responsible for the procedure code**

**\*The person titles used in this procedure code relate to all genders, unless otherwise stated.**

## **1. The LAPP whistleblower procedure code**

### **What is a whistleblower system?**

For LAPP, the requirement for compliance and integrity, and therefore lawful conduct, is top priority. As a result, it is important to detect risks early on and avoid them proactively. A whistleblower system is thereby a key tool with which notification of risks and misconduct can be submitted and investigated. The LAPP whistleblower system enables us to find out about potential risks and misconduct at LAPP, our business partners, and companies which are otherwise connected to us. It is there to provide information when, in a professional context, information or well-founded suspicions exist about actual or potential misconduct. This way, misconduct can be objectively reviewed and according measures implemented as quickly as possible – for the specific case of misconduct and also to prevent future cases.

The whistleblower\* must thereby be able to assume, to the best of their knowledge and belief, that the information is the truth. If a report discloses a trade secret, it is also necessary that the whistleblower really does have reason to believe that such disclosure is necessary in order to reveal the case of misconduct. We systematically investigate the reports we receive and, if necessary, instigate suitable follow-up action.

#### **a) Risks and misconduct at LAPP**

Reporting risks and misconduct at LAPP helps to prevent loss. Compliance violations damage the company, and misconduct by individuals is at the expense of all employees. Compliance and integrity form the basis of LAPP's good reputation and the trust of our business partners. Likewise, compliance has an effect on the welfare of our staff and therefore the long-term economic success of our company.

In order to counteract and prevent such damage as quickly as possible, we need your help. We therefore bank on your preparedness to report potential irregularities and misconduct if there is tangible, well-founded suspicion.

#### **b) Risks and misconduct by business partners and other companies who are otherwise connected to LAPP**

We expect integrity not only from all of our employees, but also from our business partners.

At LAPP, we aim in particular to reach our financial, social and environmental goals on an equal and synchronous footing. In order to fulfil this responsibility at a global level and in our business relationships, we implement various measures for our suppliers.

However, should risks and misconduct occur at our business partners or companies otherwise connected to LAPP, in particular violations of sustainability standards, we must be informed about them – for which we keep our whistleblower system ready.

### **What is a procedure code?**

This Procedure Code contains all the information about how to submit a report via the whistleblower system at LAPP. Whistleblowers will find out how to send a report, what procedural steps will trigger a notification, how whistleblowers are protected and informed of further steps,

and when feedback can be expected.

The LAPP group has already had a whistleblower system for several years. This Procedure Code is meant to supplement that system by making it transparent.

The Procedure Code should encourage whistleblowers, and those helping whistleblowers to submit a report, to support LAPP and ensure compliance.

### **Since when does our procedure code apply?**

The procedure code for the LAPP whistleblower system applies immediately. To keep it current, it is reviewed at least once a year, and amended if necessary.

## **2. Our procedure code**

### **For which type of whistleblowing can the procedure be used?**

You can use the whistleblower system to report violations of statutory provisions (including the law regarding supply chain due diligence), voluntary self-commitments and internal company regulations, in the following areas in particular:

- Accounting, auditing and internal financial controls
- Corporate integrity
- The environment, health and security
- HR, diversity and respect in the workplace
- Misuse/embezzlement of assets or services
- Others

#### ***Note: Complaints process for the LAPP supply chain***

*Potential violations of our Business Partner Standards, in particular human rights violations and breaches of environmental protection standards by our direct and indirect suppliers, can also be reported to the whistleblower system. Reports received by the whistleblower system will be forwarded to the internally relevant points of contact for the complaints process.*

*The complaints process for the LAPP supply chain serves to process notifications or complaints about potential human rights violations and breaches of environmental protection standards along the LAPP supply chain.*

You will receive detailed information about the individual topics during the reporting process.

You can also use the whistleblower system if you have questions about compliance matters.

The whistleblower system is not for feedback or complaints concerning products or services of LAPP or our business partners. If you are unsatisfied with services or products, please contact our customer service team or your direct point of contact.

### **Who could reports of violations concern?**

A report may concern LAPP's own business units, as well as units of business partners (e.g. direct and indirect suppliers).

You can report any of the following violations:

- Those committed by employees of the LAPP group in connection with their professional activity
- Those committed by business partners (e.g. suppliers) of the LAPP group

### **Via which channels can misconduct be reported?**

The LAPP whistleblower system offers various free, internal reporting channels to report potential misconduct or ask questions about compliance:

- **Online reporting system**

With its online reporting system, the LAPP whistleblower system provides a free, internal reporting channel to report potential misconduct or ask questions about compliance.

Information and questions can be directed either to the central reporting office of Lapp Holding SE in Stuttgart or locally to the respective national company with its own online reporting system. The user group for processing reports received via the digital reporting platform consists of representatives from the Global Compliance, Internal Audit and HR departments

The web-based whistleblowing system **otris** is provided by an external service provider in compliance with strict, minimal access rights. Reporting takes place via an online form in the tool, with which the whistleblower can submit a report by stating the topic, subject and the situation.

Reporting can take place anonymously or with names. There are no time or technical limits for submitting a report. The whistleblowing system is available in German, English and 18 other languages, and can be extended to support additional languages if necessary.

The system is confidential and secure. If your desired language is not listed, you can submit a report in any other language.

If you wish to submit a report anonymously or with your name, click on the “Send Report” button. The subsequent reporting process is comprised of the following three steps:

1. First, you will be asked to select the right topic for your notification. To do so, there will be a list of topics to choose from. Then, please fill in the subject and report text field. Write your report in your own words and, if you wish, add files. Please remember that documents may contain information about the author. It is up to you whether you wish to remain anonymous or reveal your identity.

It would be helpful in your report to consider the following questions:

- Who was or is involved?
- What happened?
- Where did it happen?
- When did it happen?
- Who knows about the situation?
- How can the facts be proven?

Documents that may be helpful when investigating should be provided with the report.

2. In the next step, you will set yourself a password that you can use for your anonymous mailbox (to track the report). You can set a password yourself (min. 12 characters) or generate an automatic password. After you have set a password, you must confirm it with a security question. Please store your password carefully, as you will need it to access your anonymous mailbox.
3. In the final step, you will receive your report ID. Please store it carefully. You will also need your report ID to access your anonymous mailbox.

If you have already created a protected mailbox, you can access it directly via the “Track my report” button. Here, you must also confirm the security question first. If you have not entered an email address, please check at regular intervals if you have received a response to your report. You will receive access to the anonymous mailbox with your report ID and the password you have set or generated automatically. Here, you can track your report, see responses from the recipient, and send additional information.

As long as you do not enter any data that allows you to be traced personally, the digital whistleblower system will technologically protect your anonymity.

Please check the mailboxes for new responses at regular intervals. We will confirm receipt of the report to you via the mailbox, and if necessary we will ask questions that may be important to resolve the case.

- **Compliance email**

You can reach the LAPP whistleblower system via the following email address:

[Compliance.de.lhi@lapp.com](mailto:Compliance.de.lhi@lapp.com)

Representatives from Global Compliance, Internal Audit and HR deal with incoming information and questions.

The mailbox is subject to strict, minimal access rights. Reports can be made in writing, in German and English, round the clock, 365 days a year. A telephone or personal appointment can be arranged.

- **Compliance hotline**

You can reach the LAPP whistleblower system via the following compliance hotline:

+49 711-7838 8888

Incoming telephone calls and questions are handled by representatives of the Global Compliance, Internal Audit and HR department.

- **Compliance Organization**

The Compliance Organization is available worldwide.

The Global Compliance and Internal Audit departments in Stuttgart are typically involved in processing reports and questions on compliance that are addressed directly to the Chief Compliance Officer.

You can reach the Chief Compliance Officer at the following postal address:

LAPP Holding SE

Chief Compliance Officer

Abteilung Global Compliance

Oskar-Lapp-Str.2

70565 Stuttgart

If you wish to arrange a personal appointment, send us an email beforehand, to arrange the appointment, to [compliance.de.lhi@lapp.com](mailto:compliance.de.lhi@lapp.com).

The LAPP regions and subsidiaries have regional and local compliance officers as points of contact for reports and questions. A report can usually be made in the local language, or at least in English. Reports and questions are generally processed locally. If there is any indication of significant misconduct, representatives of the Global Compliance and Internal Audit departments of Lapp Holding SE will handle the case.

The central Global Compliance and Internal Audit departments of Lapp Holding SE are obliged to maintain the confidentiality of the identities of the persons providing the information and all persons named in the information. When processing a report, it will always act in a confidential and impartial manner, bound by instructions, so that independent completion of tasks as part of the whistleblower system is guaranteed.

If necessary, other departments/specialist areas with investigative duties may be appointed for the internal investigation of the matter. The principles mentioned apply accordingly for all investigating personnel.

### **How will we process your message?**

Seven days at the latest after receiving the report, its receipt will be confirmed, unless this is not possible due to anonymity.

First, a validity check will be carried out. An unbiased review of the content and circumstances will hereby take place, to check their plausibility. The reporting person may be asked to provide further information, if necessary.

If, after examination, the circumstances prove to be not plausible, e.g. incomprehensible, legally or factually impossible, or for any other reason not convincing, the whistleblower will receive a corresponding answer. The matter will therefore be closed and not pursued any further.

If the circumstances are considered plausible, an investigation will take place in the second step, using set criteria. If necessary, other departments/specialist areas with investigative duties may be appointed for the internal investigation of the matter. For the persons concerned, presumption of innocence applies until the violation is proven.

Should the report be proven to be untrue during the investigation or if, despite appropriate investigation efforts, it cannot be confirmed or considered valid, the investigation will be terminated. The whistleblower will be sent an according response, unless this is not possible due to anonymity.

If the report proves to be true during the investigation of the circumstances, appropriate measures will be taken to remedy the ascertained misconduct and limit damage, and to prevent related risks, if necessary. If internal investigations or the rights of the persons who are the subject of a report or named in the report are not impaired, the whistleblower will be sent a response that contains the follow-up measures taken and planned, and an explanation. This does not apply if a response is not possible due to anonymity.

The times needed to process reports may vary. The investigation should generally be completed within three months of confirmation that the report has been received.

### **How are you protected against discrimination or punishment due to your reporting of potential misconduct?**

Discrimination of whistleblowers or anybody who contributes to the investigations at LAPP is not tolerated. You will not be subjected to any negative consequences due to having submitted a report. Demonstrable, intentional misuse of the whistleblower system, e.g. if you knowingly and falsely accuse another person, is excluded.

### **Documentation**

Incoming reports and related activities are documented. This also applies for reports that transpire to be not plausible. Received reports are documented in the form of a content log.

The documentation of the entire process is subject to a strict access and roles plan. Access is limited to members of the Compliance Organization and, if necessary, certain departments/specialist areas who will contribute to the investigation. The applicable data privacy regulations are observed; personal data is anonymized or pseudomized where necessary.



**Party responsible for the procedure code**

The party responsible for the Procedure Code is:

Lapp Holding SE

Oskar-Lapp-Str.2

70565 Stuttgart

0711/7838-01

[www.lappgroup.com](http://www.lappgroup.com)