

# Compliance Hotline Policy

## PREAMBLE

The HOYER Group has set up a Compliance Hotline to receive reports in accordance with the EU Whistle-blower Protection Directive and other laws as well as complaints in accordance with the German Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains.

The Compliance Hotline is part of our **compliance and risk management system**. The hotline helps preserve the integrity of our company and its employees<sup>1</sup>, and protects us and our business partners from damage and loss of reputation. Malpractices, illegal and incorrect behavior must be detected early so that they can be stopped and damage can be minimized or prevented. The HOYER Group offers secure and trustworthy whistleblowing channels to uncover violations in our own business operations and in our supply chains, to optimize internal processes and to strengthen the trust of employees, our business partners, and all other stakeholders. In doing so, the HOYER Group attaches the greatest possible importance to protecting the whistleblowers.

This Policy explains who can report which facts, how this is done, and what happens and must be observed after a report.

## WHO CAN SUBMIT REPORTS

All persons who have obtained information about possible violations at or by the HOYER Group can report them. These are in particular **employees** of the HOYER Group, but also freelancers, temporary workers, employees of (sub)contractors, suppliers, business partners and customers, or other **third parties**. Persons who are applying for a job with us or who are or have been in a selection process can also contact the hotline.

## SUBJECT OF THE REPORTS

All facts in respect of which the HOYER Group can be expected to have a legitimate interest in obtaining knowledge of them should be reported. These may be violations of laws, internal Group guidelines or the Code of Conduct or Supplier Code. These include as well human rights or environmental risks or violations that are imminent or have already occurred as a result of the HOYER Group's business activities in its own business area or along the supply chain,

These are, for example, but not limited to, indications of:

- Corruption or misuse of power,
- Exploitation of conflicts of interest,
- Data privacy violations,
- Violations of money laundering laws,
- Environmental violations,
- Human rights violations,
- Violations of working time and wage laws,

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<sup>1</sup> All references to persons apply equally to all genders.

In principle, the HOYER Group Compliance Hotline should not be used to report:

- Immediate threats to life or property: If you need emergency assistance, contact your local authorities, or call your country's emergency phone number. The HOYER Group also has an Emergency Number (+49 40 55 44 77 44) in place to cover crisis situations.
- With malicious intent: Do not make a report, if at a time of reporting you know that the report includes wrong or misleading information.
- Practical customer complaints (e.g., a late delivery or order entry problem): Please contact your HOYER representative.
- Concerns or grievances in relation to HR matters or interpersonal problems: please contact your direct manager and/or HR contact.

Please note: You can report not only violations that factually have already been committed or are still ongoing, but also planned, attempted or suspected violations.

The HOYER Group asks all whistleblowers to make such reports using one of the reporting channels provided. The prerequisite is that the employees have sufficient reason to believe at the time of the report that the reported information is true and represents a report-relevant issue.

## PROCEDURE OF A REPORT

All persons who have contact with the activities of the HOYER Group and have become aware of facts relevant to reporting can make reports in the following ways:

## OUTSOURCED INTERNAL REPORTING OFFICE OF THE HOYER GROUP

The HOYER Group has implemented the whistleblowing system of SpeakUp to receive whistleblower reports and to follow them up internally. The system accepts messages both via the Internet and by telephone.

Reports can be submitted:

- For HOYER Group employees digitally via: <https://hoyergroup.speakup.report/en-GB/internalcompliancehotline/home> or with this QR Code:



- For third parties digitally via: <https://hoyergroup.speakup.report/en-GB/externalcompliancehotline/home> or this QR code:



■ by telephone: [phone numbers<sup>2</sup>](#)

## EXTERNAL REGULATORY REPORTING OFFICES

Whistleblowers can also contact external official reporting channels, in Germany for example the Federal Office of Justice, the reporting offices of the respective federal states or the German Antitrust Office. Information on how these external official reporting channels deal with reports, for example on their procedure, can be found in the corresponding published official information.

## CONFIDENTIALITY

The **confidential treatment of all information and data** at the HOYER Group is ensured at all times and in every processing step.

Only individual and authorized persons have access to incoming reports and information on the processing of the report or follow-up measures. The reported data is protected from access by unauthorized persons.

In any case the identity of the whistleblower will be treated confidentially. This also applies to persons who are the subject of a report and other persons named in the report.

The reported data can only come to the knowledge of authorities or third parties, including the person subject of the report, in exceptional situations. In such cases, the whistleblower will be informed in writing by the HOYER Group of the disclosure and the reasons for it before the disclosure is made to third parties. This notification shall only be omitted if this would jeopardize the official investigation.

## ANONYMOUS REPORTS

The protection of whistleblowers is always our top priority. It is therefore also possible to submit reports anonymously. Whistleblowers can decide whether and which personal data concerning themselves they wish to disclose to the reporting office or to the HOYER Group.

To enable or facilitate subsequent contact (e.g., in the event of queries, clarification of the facts and conflict resolution), please be sure to note and save the Case Number. The same applies to the password that you generate yourself when making a report via the Internet or for the pin code that you determine yourself in the event of a call. You will need the case number and the password or pin code to view the current processing status of your report and, if necessary, to be able to send you an enquiry.

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<sup>2</sup> Please be sure to mention the relevant organization code ('internal' if you are an employee or embedded contractor of HOYER Group, or 'external' if you are a customer, supplier or other third party).

## DATA PRIVACY

The processing of personal data in the HOYER Group<sup>3</sup> is also carried out in compliance with the data protection regulations of the **General Data Protection Regulation** as implemented in Germany in the Federal Data Protection Act.

If the whistleblower provides his personal data and/or a contact option to the respective reporting office, he thereby agrees to this being used for the purpose of contacting the whistleblower, for example in case of queries or for information on follow-up measures.

## PROCEDURE AFTER RECEIPT OF A REPORT

Once the report has been received via the Compliance Hotline, receipt of the report is confirmed to the whistleblower within one week. All reports, regardless of whether they are received digitally or by telephone, are forwarded to the Group General Counsel for further processing. The Group General Counsel can also be contacted personally by telephone, email, and post.

The Group General Counsel and the other persons responsible for the report are independent and not bound by instructions when processing the reports and are obliged to maintain confidentiality.

He discusses the facts of the case and maintains contact with the whistleblower, checks the plausibility of the report and takes any necessary follow-up measures. He is authorized to forward the report internally to the responsible function or to investigate the matter with the involvement of internal or external experts.

Insofar as the whistleblower has provided contact details, he will be informed as soon as possible, but at the latest within the statutory deadlines, about the progress of the processing of his report and any follow-up measures that have been initiated, provided that this does not jeopardize investigations or enquiries or the rights of the person(s) who were the subject of the report.

The time for processing the report depends on the individual case and can therefore take from a few days to several months. However, HOYER Group endeavors to complete the investigation in a timely manner. If neither sufficient fact-based information is available nor is it possible to contact the whistleblower, the reported offence will be closed due to lack of substantiation.

## PROTECTION OF THE WHISTLEBLOWER

**Whistleblowers who express well-founded concerns or suspicions do not have to fear any adverse consequences under criminal, civil or labor law. In particular, such whistleblowers are not threatened with adverse consequences such as dismissal, warnings or other (financial) consequences. This also applies if a report subsequently proves to be unfounded.**

The only situation in which this protection does not apply is if whistleblowers deliberately report unfounded speculation or rumors. In this case, the HOYER Group reserves the right to take action under civil law, labor law and criminal law against the person who deliberately makes a false report.

## QUESTIONS & CONTACT

All persons affected by this policy have the following contact options for questions:

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<sup>2</sup> See the data protection information of the HOYER Group (available at <https://www.hoyer-group.com/en/data-privacy>).

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