

# Compliance Hotline Policy

## PREAMBLE

We as the HOYER Group have set up a compliance hotline as a whistleblower system.

The hotline is part of our **compliance management system** and helps preserve the integrity of our company and its employees<sup>1</sup> and protect us and our business partners from damage and loss of reputation. Malpractices, illegal and incorrect behaviour must be detected early so that they can be stopped and damage can be minimised or prevented. The HOYER Group offers secure and trustworthy whistleblowing channels to uncover violations in the employment context, to optimise internal processes and to strengthen the trust of employees in our company. In doing so, the HOYER Group attaches the greatest possible importance to protecting the whistleblowers.

Our whistleblower system meets the requirements of the EU Whistleblower Protection Directive, the German Supply Chain Due Diligence Act and other laws.

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

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

## CONTENTS OF THE REPORTS

All facts can be reported if the HOYER Group has a legitimate interest in obtaining knowledge of them. This is the case, for example, if whistleblower reports are required by law or if the reported facts constitute a **criminal or administrative offense** (against the company or in the context of employment) or significant **legal violations** in connection with the business operations of the HOYER Group.

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

- Discrimination or workplace bullying,
- 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.

Not only planned or attempted violations or those already committed may be reported. A corresponding suspicion may also be reported. Even if a suspicion subsequently turns out to be false, the whistleblower will not suffer any disadvantages if he acted in good faith and with the best intentions.

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<sup>1</sup> For better readability, the simultaneous use of gender-specific forms of language is dispensed with in the following, and the generic masculine is used. All references to persons apply equally to all genders.

The HOYER Group asks its employees 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 commissioned the law firm Heuking Kühn Lüer Wojtek to perform the tasks of an internal whistleblower reporting office and to receive whistleblower reports. The reports are received by experienced lawyers at Heuking Kühn Lüer Wojtek, anonymised if requested by the whistleblower, and processed.

Protection of the whistleblowers always comes first. All reports are treated **confidentially**. It is therefore possible to make reports **anonymously**.

The outsourced internal reporting office of the HOYER Group has been set up with the following contact details:

**Kanzlei Heuking Kühn Lüer Wojtek**  
Magnusstrasse 13  
50672 Cologne, Germany  
Tel.: +49 221 20 52 223  
Fax: +49 221 20 52 224  
E-mail: [hoyer-compliance@heuking.de](mailto:hoyer-compliance@heuking.de)

The report can be submitted using the contact details given above

- by telephone
- by e-mail,
- by fax,
- by post,
- in person or
- digitally via a web form on the website [www.hoyer-group.com](http://www.hoyer-group.com) or by smartphone via <https://whistle-fox.heuking.de/fastline/hoyer/en>.

## EXTERNAL REGULATORY REPORTING OFFICES

Whistleblowers can also contact external official reporting offices, in Germany for example the **Federal Office of Justice**, the Federal Commissioner for Data Protection or a reporting office of the respective federal state. Information on whistleblower reports to the external regulatory reporting offices, 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 authorised 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 unauthorised persons.

In any case the identity of the whistleblower will be treated confidentially.

The reported data can only come to the knowledge of authorities or third parties, including the reported persons, 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 jeopardise the official investigation.

## PERSONAL DATA

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

## ANONYMOUS REPORTS

Whistleblowers can decide whether and which personal data concerning themselves they wish to disclose to the reporting office or to the HOYER Group.

In the case of a report to the outsourced internal reporting office of the HOYER Group at Heuking Kühn Lüer Wojtek, there are **two options for anonymous reporting**:

Whistleblowers can submit their report **completely anonymously from the beginning** (without name, without contact details, anonymous e-mail address, etc.).

In order to enable or facilitate subsequent contact (in the event of queries, clarification of the facts and conflict resolution), there is also the option of **anonymising the report by the outsourced internal reporting office before forwarding the report to the HOYER Group**: The whistleblower can submit his report to the reporting office, stating his personal (contact) data and explicitly indicating at the same time that he does not agree to his personal data being forwarded to the Chief Compliance Officer of the HOYER Group. In such cases, the personal data of the whistleblower will only be stored at the outsourced internal reporting office and will not be forwarded. In these cases, the compliance officer of the HOYER Group receives a purely anonymous report from the outsourced internal reporting office, on the basis of which it is impossible for the HOYER Group to trace the whistleblower. Compared to a completely anonymous report, the advantage is that both the whistleblower and the outsourced internal reporting office can subsequently contact each other without jeopardising the required anonymity of the whistleblower vis-à-vis the HOYER Group.

## DATA PROTECTION

The processing of personal data in the HOYER Group<sup>2</sup> and the outsourced internal reporting office<sup>3</sup> is also carried out in compliance with the data protection regulations of the **General Data Protection Regulation** and in Germany the Federal Data Protection Act.

## PROCEDURE AFTER RECEIPT OF A REPORT

Once the report has been received by the outsourced internal reporting office, receipt of the report is confirmed to the whistleblower. The report is recorded and processed by the outsourced internal reporting office and forwarded – anonymously if requested – to the Chief Compliance Officer of the HOYER Group.

**The HOYER Group investigates all reports.** The Chief Compliance Officer of the HOYER Group examines every report with the involvement of the legal department and local management.

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.

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

<sup>3</sup> See the data protection information of the law firm Heuking Kühn Lüer Wojtek (available at [https://whistlefox.heuking.de/UserContent/Legal/Datenschutzinformation\\_en.pdf](https://whistlefox.heuking.de/UserContent/Legal/Datenschutzinformation_en.pdf)).

## PROTECTION OF THE WHISTLEBLOWER

If whistleblowers report a suspicion that is not obviously unfounded and concerns a factual situation that is relevant to report, they will not be reprimanded or otherwise disadvantaged because of this report. Corresponding reprimands or any reprisals on the basis of justified reports are prohibited by law and are also expressly forbidden in the **HOYER Group Code of Conduct**.

**Whistleblowers do not have to fear any adverse consequences under criminal, civil or labour law. In particular, whistleblowers are not threatened with adverse consequences such as dismissal, warnings or other (financial) damage. This also applies if a report subsequently proves to be unjustified.**

The only situation in which this protection against disciplinary action does not apply is if whistleblowers deliberately report untrue information. In this case, the HOYER Group reserves the right to take action under civil law, labour 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:

**Dr Torben Reher**  
Chief Financial Officer /  
Chief Compliance Officer

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Chief Executive Officer

Dr Torben Reher  
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