



Reporting System Rules of Procedure

Novem Group

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1 What can be reported?

You can use the reporting system to report violations of our Code of Conduct or violations of the law, including issues concerning bribery and corruption, competition law, fraud, financial crime, harassment or discrimination, international trade controls, the protection of personal data, rights and protection of persons, serious environmental damage or conflicts of interest.

Human rights and environmental risks as well as violations of human rights or environmental obligations caused by the actions of the company itself or by the actions of a direct supplier of the company can be reported in particular.

2 When will I receive feedback and how will I be contacted?

You will be contacted either via the secure mailbox or (if available) via the contact details of the person making the report.

Receipt of the report will be confirmed by the person responsible as soon as possible. The report is then checked and an initial assessment is made, which normally takes a few days. Any open questions can be communicated to the person making the report. A joint discussion of the circumstances with the person making the report will be held if this is possible based on the contact details provided.

The subsequent detailed investigation of the facts may take a few days or weeks to several months, depending on the complexity. The person making the report will be informed when the procedure has been completed.

Latest date for feedback: Receipt of the report will be confirmed after 7 days at the latest. The status of the case will be communicated again after 3 months at the latest.

Enquiries about the current status can be made at any time via the secure mailbox or other contact details provided.

3 Are there any other channels I can use to submit a report?

Other channels include e-mail (compliance@novem.com) or telephone (+49 9205 181117). Availability by telephone is not guaranteed at all times.

4 Who processes the reports?

Reports are processed centrally by the Corporate Legal and Compliance department. In addition, a person responsible for the reporting system or for compliance at the Novem company concerned may have access to the report. For reports concerning Novem suppliers, a person responsible for the supplier may be given access to the report.

All processors are independent, impartial and not bound by instructions in the processing of reports. They are obliged to maintain confidentiality.

5 Will my report be passed on to third parties?

Reports received may also be passed on in anonymised form to affected suppliers or other third parties (e.g. external reporting systems, organisations), e.g. to remedy any grievances.

6 How will my report and my data be stored and documented?

Reports can be made including personal data or anonymously. You can find further information on this [here](#). Please also note our [information on data protection](#). As a rule, documentation relating to a report is deleted after three years.

7 How will I be protected against discrimination?

Reports are always processed confidentially. In accordance with the Code of Conduct, which is binding for all employees and suppliers, discrimination against persons making a report is prohibited and has consequences. Corporate Legal and Compliance assesses the risks of discrimination and, if necessary, takes measures to prevent discrimination. Consultation with the person making the report may also take place in this case. The person making the report is encouraged to report any discrimination.

8 Note

The complaints procedure and the discussions held as part of it do not usually constitute measures that suspend the statute of limitations. If you wish to assert claims, please take responsibility for ensuring that measures to suspend the limitation period are taken in good time.