

SEVERIN Elektrogeräte GmbH, Sundern

**Whistleblower policy**

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## **Introduction**

At SEVERIN ("**Company**"), we offer our customers high-quality electrical appliances that make their lives more convenient. We are always reliable, honest and cooperative.

SEVERIN is committed to conducting business honestly and fairly. We expect our entire workforce to maintain high standards. Any suspicious misconduct should be reported as soon as possible. The aim of the following regulation is therefore to uncover criminal acts within the SEVERIN Group that might otherwise remain hidden. The possible anonymity ensures that employees are not threatened with negative consequences for their employment relationship as a result of a report.

This guideline is intended to create the framework conditions for the communication of information on possible compliance violations to specific persons or via an electronic whistleblowing system within the framework of the SEVERIN Compliance Guideline. In doing so, this policy shall ensure sufficient consideration of the legitimate interests of the company, the whistleblowers, the persons affected by the whistleblowing, as well as the general.

### **1. 1. What is meant by Whistleblower?**

A Whistleblower is someone who makes a report to help identify and prevent future misconduct or dangers related to our business. This includes all illegal, abusive and criminal activities and any violation of legal obligations. It does not include general complaints or inquiries about product and warranty issues..

### **2. Organisation**

We have decided to record the reports in oral or written form using the digital whistleblower solution of Aderhold Rechtsanwaltsgesellschaft mbH ("Aderhold"). The reports can be read by an authorized attorney of Aderhold and the compliance officer(s) (collectively, the "whistleblower unit"). The Whistleblower Unit shall, as soon as possible, at the latest within three months, propose to the management what measures are to be taken for an appropriate response in the event of unacceptable conduct..

### **3. Protection and support for whistleblowers**

We want to encourage openness and will support whistleblowers who report incidents covered by this principle, even if it later turns out to be unfounded.

Whistleblowers should not have to fear disadvantages because they have reported such cases. Anyone who believes they have been disadvantaged should immediately inform the manager responsible for uncovering misconduct. If this should not resolve the matter, a formal complaint should be made.

Whistleblowers are not allowed to be threatened or retaliated against in any way. Anyone involved in such an action must expect to be subject to measures under labor law. In certain cases, whistleblowers also have the right to sue for damages before an employment tribunal.

Conversely, if we determine that a whistleblower has deliberately made false accusations or because this gives him or her personal advantages, the whistleblower must also expect measures under labor law. If there is any doubt, the relevant facts must not be presented as a fact, but as an assumption, assessment or statement to other persons.

#### **4. How it works in detail?**

##### **4.1 Notification and processing deadline**

Exclusively for whistleblowing purposes, we have set up a telephone hotline and web solution with Aderhold where every employee, business partner (service provider, supplier, etc.) can report company-related legal violations openly by name but also anonymously, as follows:

Phone number: +49 800 3800 999 (Mo.-Fr.: 09-17 h)	QR Code:	
Link: <a href="https://app.hinweisgeberloesung.eu/report/d24dc964-5ed3-4232-a9c1-80e5bc8154a2">https://app.hinweisgeberloesung.eu/report/d24dc964-5ed3-4232-a9c1-80e5bc8154a2</a>		

Every hint will be followed up carefully and justified. In the case of an anonymous report, it is essential to provide comprehensive information on the relevant facts. You can also contact the whistleblower solution again in the case of an anonymous report (by telephone or via the whistleblower system) if you have noticed any additional circumstances. In addition, the compliance officer can contact you anonymously via the chat function of the whistleblower solution for further questions.

The Compliance Officer will document the reported information, including the date of the report, the nature and circumstances of the reported violation and, if applicable, the name(s) of the person(s) responsible for the alleged violation. If a contact address is provided by the whistleblower, the Compliance Officer will send him/her an acknowledgement of receipt within 7 days.

Every hint is to be responded to within a further three months at the latest; in the case of particularly serious legal violations, the Compliance Officer will immediately initiate investigations and, if necessary, take all necessary measures to put a stop to any identified delictual conduct.

During the processing of hints, the obligations arising from data protection laws are observed at all times and hints are kept particularly confidential ("need-to-know" basis). The hints are automatically deleted six months after receipt, unless further measures have become necessary.

#### **4.2 Duty to report**

The Compliance Officer shall provide each report received with a brief statement indicating in a comprehensible manner which investigative measures have been initiated, whether the suspicion reported in the report has proven to be well-founded or unfounded, and what measures have been taken to remedy the legal violation. If the reported legal violation is of fundamental importance, endangers the financial interests of the company or affects the company's business or risk policy, it must be brought to the attention of all managers of the company. In consultation with the Compliance Officer, the latter shall decide on the steps to be taken (e.g. filing a criminal complaint, reporting to customs).

#### **4.3 Notes against the compliance officer(s)**

In cases where the complaint is directed against the Compliance Officer himself/herself, the whistleblower may address his/her complaint anonymously in writing or verbally directly to the Executive Board. The addressed member of the management decides on the further procedure.

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