

# Legal information

## Whistleblower system

ABLE GROUP companies are committed to complying with applicable laws, regulations and company policies and procedures in all business dealings. Our 'Speak up' culture, advocated by senior management, supports this commitment.

Compliance is the prerequisite and the overriding principle for all activities of the ABLE GROUP, the management, and the employees. This ensures our 'licence to operate' and our trusting and reliable relationships with our customers and business partners.

The following compliance categories receive special attention:

- Anti-corruption
- Anti-discrimination
- Antitrust Law
- Human Rights
- Trade Controls
- Data protection and information security
- Occupational health and safety
- Environmental protection

The corporate principles are summarised in the <u>Code of Conduct</u> of the ABLE GROUP.

If you notice any action or behaviour that is or appears to be inconsistent with our stated commitment (examples include misconduct, questionable practices or deviations from laws, policies, and procedures), we encourage you to 'speak up' and report these observations to us. You can do this as an employee, a customer, an external partner, an employee of a supplier in the supply chain, or as someone who has another relationship with ABLE GROUP.

We value fairness in dealing with whistle blowers and employees who are affected by an allegation. Therefore, please handle the system responsibly. Defamation and violations of personal and data protection rights have no place here either.

Since we value open communication, we encourage you to provide us with your name and contact details. This gives us the opportunity to follow up on your reports as effectively as possible.

#### Reporting channels for the 'Speak up'

We expect whistle blowers to make reports in good faith and with good intentions. As an employee, we encourage you to report your concerns directly to your contact person at ABLE GROUP.

In addition, all persons can turn to the Corporate Social Responsibility Officer with their concerns. In this function, the Corporate Social Responsibility Officer acts independently and without instructions. You can reach him via the following contact channels:

- via the company-independent e-mail address: csr-able@outlook.com
- by telephone: +49 1741689226
- in person by office appointment at the ABLE Management Services GmbH, Steinmüllerallee 2, 51643 Gummersbach
- by post marked 'personal/confidential' to: Corporate Social Responsibility Officer, ABLE Management Services GmbH, Steinmüllerallee 2, 51643 Gummersbach

#### Whistle blower protection

Only the Corporate Social Responsibility Officer has access to the communication media listed above. Access by other persons is excluded. The anonymity of the whistle blower and confidentiality will be guaranteed under all circumstances. The whistle blower will also be protected from retaliation or reprisals.

#### **Further procedure**

The processing of a report to the Corporate Social Responsibility Officer is described in a procedure and includes the following steps:

- 1. issue an acknowledgement of receipt within 7 days
- 2. maintain contact with the person who provided the information
- 3. review the facts of the case, obtaining further information if necessary
- 4. take appropriate action if necessary
- 5. report back to the whistle blower within 3 months
- 6. review the effectiveness of measures taken
- 7. report periodically to the Executive Director.

The Corporate Social Responsibility Officer has the organisational independence and autonomy through the authority defined for this role to process the reports.

### **Gender-specific differentiation**

We have opted not to use gender-specific differentiation for ease of legibility. We use the relevant terms on the basis that they apply equally to all genders.