
Whistleblowing Policy

This is an English translation of the German *Hinweisgeberrichtlinie* according to *Hinweisgeberschutzgesetz (HinSchG)*. The German version is legally binding.

Issue date: March 2024

Content

1	Purpose and Scope	2
2	Authorization for submission of information	2
3	Relevant advice and good faith	2
4	Whistleblower System	2
4.1	Submission of information	2
4.2	Entrusted Persons.....	3
4.3	Receipt of information and further procedure.....	3
5	Confidentiality and data protection	3
6	Protection against discrimination	3

1 Purpose and Scope

- (1) This guideline serves to implement the possibility required by the Whistleblower Protection Act (HinSchG) to report and disclose information about violations, with particular attention to the protection of natural persons who report or disclose the violations (whistleblowers).
- (2) This whistleblower policy is intended to ensure that employees and external parties have an appropriate mechanism to report concerns about illegal activities, ethical violations, fraud or other unlawful practices within the company. This policy is intended to ensure the confidentiality, protection and legal integrity of the whistleblower.
- (3) Glassomer has set up an internal reporting office (*Meldestelle*) in accordance with the Whistleblower Protection Act. The reporting office is authorized to process personal data to the extent that this is necessary to fulfill its designated tasks. All information must be treated confidentially, as far as possible taking into account the law on the protection of trade secrets.
- (4) This guideline describes the framework conditions for reporting information to the internal reporting office. In addition to the interests of people who provide information, those who are the subject of a report, and other people affected by a report, it also takes into account the interests of Glassomer GmbH.
- (5) Information about violations that are reported in connection with the activities of Glassomer GmbH can be reported to the internal reporting office. The relevant violations according to the law can be found in Section 2 of the Whistleblower Protection Act. If information that goes beyond the legal requirements of the HinSchG is received by the internal reporting office, this information is not subject to the legal protection of the HinSchG.
- (6) This policy applies to Glassomer GmbH; for all employees, contractors and external parties associated with the company.

2 Authorization for submission of information

- (1) Any natural person is entitled to submit information, i.e. all employees as well as persons who are to be regarded as employee-like persons according to the HinSchG due to their economic dependence; third parties are also entitled (e.g. business partners, suppliers, customers).
- (2) This guideline does not oblige anyone to provide information to the internal reporting office or to external reporting offices. However, if there are legal, contractual or other obligations to provide information, these remain unaffected.

3 Relevant advice and good faith

- (1) The whistleblower system serves exclusively to receive and process reports of tips within the meaning of Section 1(3) HinSchG.
- (2) In particular, the whistleblower system is not available for general complaints or general inquiries (that are independent of such tips, e.g. regarding product or warranty questions).
- (3) Only such information may be provided if the person providing the information has good faith, based on concrete evidence, that the facts they communicated are correct.

4 Whistleblower System

4.1 Submission of information

Information can be submitted in writing, even anonymously. For written reports, Glassomer has set up an email container that completely anonymizes incoming mail. For Glassomer, the source of the email is not visible and cannot be traced. The system enables completely anonymous communication for the whistleblower. Tips can be submitted via meldestelle@glassomer.com and the whistleblower can also receive feedback from Glassomer. Furthermore, information can be sent to the postal address "Glassomer GmbH, Interne Meldestelle, In den Kirchenmatten 54, 79110 Freiburg". The envelope should be marked with the word "confidential." Verbal reports can also be sent to a responsible manager (in person or via digital communication).

- (1) Information should be submitted in as much detail as possible to enable processing and assessment of necessary measures.

- (2) The use of the whistleblower system is free of charge. There will be no reimbursement of costs that arise in connection with use (e.g. shipping costs, telephone costs, internet costs).

4.2 Entrusted Persons

- (1) At Glassomer GmbH, the administration is entrusted with receiving and processing the information. In order to avoid conflicts of interest (see also 4.3 §7), the information is passed on to a second authorized person.

4.3 Receipt of information and further procedure

- (1) Every notice and every procedure must be documented in accordance with the legal requirements.
- (2) The notice can be received in person or by anonymous letter.
- (3) The person providing the information will receive a confirmation of receipt within seven calendar days, unless this is contrary to the anonymity of the person providing the information.
- (4) The entrusted person has lawyers check whether the report falls within the scope of the HinSchG and whether the report is valid (i.e. in particular comprehensible and consistent). The person providing the information may be asked to provide further information.
- (5) The documented report is passed on to management for further investigation or the development and determination of appropriate follow-up measures.
- (6) If necessary, management will carry out investigations (if necessary with the involvement of other experts, employees or independent third parties). The person providing the information may be asked to provide further information. The investigation will be carried out within a reasonable time. The investigation process also includes checking the vulnerabilities identified from the information or determining preventive measures.
- (7) In the event of a possible conflict of interest that exists or threatens in the course of processing a tip, the person entrusted with carrying out the whistleblower procedure must ensure that the relevant tip is processed by another person in the company.
- (8) The informing person will receive feedback on the status of the procedure within three months of confirmation of receipt or - if confirmation could not be provided - at the latest three months and seven days after receipt of the report, unless this is prevented by the anonymity of the informing person.
- (9) The person providing the information will also receive feedback as soon as the procedure has been completed, unless this is prevented by the anonymity of the person providing the information.
- (10) One of the follow-up measures by the processing center may also be the conclusion of the procedure due to lack of evidence or other reasons, which must also be documented.

5 Confidentiality and data protection

- (1) The whistleblower is protected from reprisals or discrimination. It is expressly prohibited to discriminate against the whistleblower based on the information reported.
- (2) The information will be treated confidentially in compliance with the applicable legal requirements, in particular data protection. This applies regardless of whether the internal reporting office is actually responsible for the incoming report. The processing of personal data is carried out in accordance with the data protection guidelines of Glassomer GmbH published on the Glassomer homepage.
- (3) All information, regardless of its veracity, is capable of greatly damaging the reputation of the persons concerned, the whistleblowers and/or third parties, and the company. False, malicious or intentionally misleading allegations may result in disciplinary action, including employment consequences.

6 Protection against discrimination

- (1) The protection of whistleblowers from discrimination or punishment is of central importance and ensures the functionality of the reporting procedure. Persons who report possible misconduct by other people in good faith based on concrete evidence will not experience any disadvantage from Glassomer GmbH due to the fact that they have made a report - such as adverse consequences with regard to their employment (in particular dismissal, demotion, suspension, denial of promotion or discrimination). Of course, this also applies if it subsequently turns out that the evidence was incorrect (e.g. there was no misconduct).
- (2) Disadvantages that whistleblowers suffer simply because of a report are deeply condemned and will not be tolerated. If Glassomer GmbH becomes aware of such behavior, appropriate measures will be taken.

- (3) The above statements apply accordingly to third parties who are connected to the person providing the information (such as colleagues, friends, family members) or third parties who provide the person providing the information with confidential support in the context of submitting the information (e.g. through support within the framework of the Formulation of a note).
- (4) If whistleblowers or – as described above – third parties are exposed to attempts at intimidation or reprisals, it is recommended that the internal reporting office be contacted immediately.