

Whistleblowing Channel

We, the securoof Group GmbH (the "**Company**"), and its subsidiaries NIS - Nordic Industrial Services GmbH and Scandinavian Leak Detection AB, attach great importance to compliance with laws, internal guidelines and ethical principles. In order to consistently address possible misconduct, we have set up a whistleblowing channel. Through this channel, both employees and external stakeholders can report violations of legal provisions and internal regulations – confidentially and, if desired, anonymously.

The whistleblowing channel is operated by Bitkom, an external independent provider, in order to ensure that the information is processed objectively and securely. Every incoming report is carefully checked and suspected cases are consistently investigated.

What misconduct should be reported?

A whistleblower can report illegal, dishonest, or unlawful behavior, such as (but not limited to)

- ❖ a crime or misdemeanor,
- ❖ a violation of applicable laws, regulations and/or international standards (e.g. the UN Global Compact Principles or the OECD Guidelines for Multinational Enterprises),
- ❖ a breach of contractual obligations on the part of the company,
- ❖ a breach of the company's ESG policy statements and/or other policies,
- ❖ any other type of unethical or dishonest conduct (the "Misconduct").

A report must be made in the general interest of the Company.

Report in good faith

When filing a report, a whistleblower must always act in good faith and the report must be made for valid reasons. If the report contains false, unsubstantiated or opportunistic claims, or if it is made for the sole purpose of defaming or harming others, the Company may take appropriate disciplinary and/or legal action against the whistleblower.

Reporting options

You can submit information through the following channels:

Telephone

Hotline: **+49 30 27576-456**

The hotline can be reached during normal business hours (Mon-Fri 9 a.m. to 5 p.m.). When calling from abroad, please note the applicable area codes or country codes.

E-Mail

Securoof@bitkom-consult.de

Please indicate the relevant legal entity in your report so that we can process your request in a targeted manner.

Postal Mail Address

Address:

Bitkom servicegesellschaft mbH

Albrechtstraße 10

D-10117 Berlin

Please make sure that you indicate the Company and the relevant legal entity in your letter so that your report can be assigned and processed accordingly.

In Person

After making an appointment in advance, you can also submit information personally. To make an appointment, please contact: whistleblower@bitkom-consult.de

External reporting channels

In addition to the Company's contact points and whistleblowing channels, whistleblowers also have external reporting channels at their disposal. Further information can be found [here](#).

What information should be included in a whistleblowing report?

A report must be sufficiently detailed and documented, and should include the following details (if the relevant information is known):

- a detailed description of the events and how the whistleblower became aware of them;
- the date and place of the event;
- the names and positions of the persons involved or information that allows them to be identified;
- the names of other persons, if any, who can confirm the facts reported;
- when filing a report, the name of the whistleblower (this information is not requested in an anonymous report) and any other information or elements that could help the investigation team verify the facts. A whistleblower is strongly recommended to provide their name when filing a report. This facilitates the internal investigation and the implementation of the necessary measures to protect the whistleblower.

What measures are there to protect the whistleblower?

The whistleblower's identity will be kept strictly confidential. In order to ensure such strictly confidential treatment, the following measures have been taken:

- Reports are processed by case handlers and the files are kept strictly confidential. Only authorized persons of the investigation team have access to this data.
- All internal and external parties involved in the investigation and follow-up are subject to strict confidentiality obligations. Unauthorized disclosure of information related to a whistleblower's investigation, report, or identity will not be tolerated and will result in disciplinary action. Depending on the circumstances, such conduct may also result in other actions, including civil or criminal lawsuits.
- The identity of the whistleblower will not be disclosed unless
 - the whistleblower expressly consents to the disclosure or
 - disclosure is required by law. Depending on the nature of the reported misconduct, it may be a legal requirement to involve the state authorities in order for an official investigation to be initiated. In such cases, the Company may be required to disclose the name of the whistleblower to the state authorities, while maintaining the strict confidentiality of the whistleblower at all times. The Company will inform the whistleblower if their identity has been reported, unless such disclosure would jeopardize the investigation or legal proceedings.

Anonymity and confidentiality

If you wish to remain anonymous, you can do so via our externally operated whistleblowing channel. This guarantees the highest level of confidentiality and anonymity within the framework of the applicable legal provisions. The Company makes all reasonable efforts to investigate an anonymous report, but points out that in some cases, there are restrictions on what can be achieved in the event that the whistleblower chooses to remain anonymous.

Our process at a glance

❖ Step 1: Contact us

You can submit a report by phone, e-mail or post. All communication channels can be accessed in English or German.

❖ Step 2: Confirmation of receipt

You will receive a confirmation of receipt and a contact for the further course of the procedure within seven days. We make every effort to use the language that ensures the best possible communication during the proceedings.

❖ Step 3: Team of experts checks

A team of experts takes over the processing of the tip and checks the validity of the tip. In the event of a rejection, you will receive an explanation.

❖ Step 4: Clarification of the facts

Other parties involved can be called in to clarify the facts, if necessary in consultation with you.

❖ Step 5: Remedial action

Subsequently, if necessary in consultation with you, proposals for remedial action will be developed. Within about three months after confirmation of receipt, you should be informed of the result and any derived measures.

❖ Step 6: Conclusion

We will archive the facts of the case and the remedial measure in accordance with the legal requirements.

❖ Step 7: Feedback

Voluntary feedback from you after the process has been completed will help us to further develop our complaints procedure.

We thank you for your support in maintaining integrity and compliance in our company.