

RULES OF PROCEDURE BKMS

Our standardized complaints and whistleblowing procedure in accordance with the Supply Chain Due Diligence Act and the Whistleblower Protection Act

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1. Scope of application

With the BKMS (Business Keeper Monitoring System), Erwin Hymer Group SE has implemented a group-wide complaints and whistleblowing system that serves as a central reporting point. This system enables all employees and external third parties to confidentially and securely report complaints and indications of possible violations of legal provisions or internal guidelines. The complaints and whistleblowing system is an important part of our compliance strategy and helps to maintain the integrity and ethical standards of our company.

The system is operated by an independent external platform to ensure anonymity and protection of the reporting person. Every complaint and notification is carefully examined and handled in accordance with legal requirements and internal procedures.

2. Who can submit complaints and notifications?

The complaints and whistleblowing system is accessible to everyone. Employees as well as persons and organizations outside the Erwin Hymer Group SE can use it to submit complaints or notifications.

3. What can I report?

Any suspicion relating to an actual or potential violation of legal provisions or internal guidelines can be reported. This also includes concerns regarding human and environmental rights. The suspicion may relate to the behavior of individual colleagues or be in connection with our business activities or one of our suppliers.

4. Which options exist for submitting complaints and notifications?

Erwin Hymer Group SE has various reporting channels that can be used for a complaint or notification.

BKMS is an external platform that meets the highest standards and is certified under European data protection law. It can be used to submit complaints or information at any time, either anonymously or via a mailbox. The BKMS is available in various languages.

Complaints and information by post should be sent to the following address:

Erwin Hymer Group SE
Group Compliance Office
Holzstraße 19
D - 88339 Bad Waldsee

5. Who is responsible for processing complaints and notifications?

The Group Compliance Office of Erwin Hymer Group SE is centrally responsible for processing complaints and notifications. The employees of the Group Compliance Office are specially trained, impartial and subject to a special duty of confidentiality. If necessary and legally permissible, the responsible employees of the relevant departments are involved in investigative or remedial measures.

6. Are complaints and notifications treated confidentially?

The BKMS is an application with a strictly limited user group. Once a complaint or notification has been submitted, the system cannot be viewed from outside and is locked. Information from the system is consistently passed on in accordance with the requirements of the GDPR. In accordance with the "need-to-know principle", only a few authorized persons, such as the Group Compliance Office, are given access to sensitive data, including names and company affiliation. Confidential information is only passed on if it is absolutely necessary and legally permitted. If information needs to be passed on to other departments, this is done without sensitive data where possible. It is also possible to submit notifications anonymously. Both anonymous and non-anonymous notifications are treated with the same care.

Complaints in connection with the Supply Chain Due Diligence Act are documented for 7 years, other information for 3 years and then deleted.

7. How does the notification submission work?

First, an information text appears with details on protecting the anonymity of the person providing the information and a security prompt.

On the next page, the focus of the complaint or notification is queried.

On the following report page, the complaint or notification must be formulated in your own words. Additional questions can be answered (optional). There are 5,000 characters available for the free text. Files up to 5 MB in size can also be sent to support the complaint or notification. After sending the complaint or notification, the person making the notification receives a reference number as proof that the notification has been sent.

It is then possible to set up a separate, protected mailbox for the complaint or notification sent. This is not mandatory, but is important for the Group Compliance Office, e.g., to ask questions or provide feedback on progress. A username and password must be assigned to set up the mailbox. The username can also be pseudonymized so that anonymity is maintained even with a mailbox.

The whistleblower can access the mailbox at any time via the "Login" button and can thus remain in contact with the Group Compliance Office.

8. How does the notification processing work?

Upon receipt of a complaint or notification, receipt will be confirmed within 7 days, provided that a mailbox has been set up or other contact options have been specified.

An initial plausibility check is carried out following receipt of a complaint or notification. If further questions are necessary and a contact option is available, EHG will contact the person providing the information and ask for clarification.

If the report appears plausible and substantiates an initial suspicion, the Group Compliance Office initiates an internally or externally supervised investigation procedure, depending on the facts of the case. The investigative measures vary depending on the individual case and can, for example, consist of reviewing documents, interviewing witnesses and affected parties or analyzing electronic data.

In special exceptions, it may also be necessary to forward the data to a competent authority.

At the end of the fact-finding process, remedial and/or disciplinary measures are recommended, depending on the outcome.

If possible and legally permissible, the whistleblower will be informed of the measures taken within three months - even if the investigation has not been completed by then.

9. How are reporting persons protected?

EHG does not tolerate any disadvantages or reprisals resulting from a complaint or notification. We investigate all plausible allegations of discrimination based on a complaint or notification.