

DOUGLAS

Whistleblower Guidance

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This guide, as well as the effectiveness of the whistleblowing procedure, are reviewed on a regular basis.

1. Purpose

This guide is designed to protect our corporate values and culture, to ensure that our employees and business partners may raise concerns without fear of retaliation, and to provide a transparent and confidential process for handling these reports. Therefore, at DOUGLAS, we offer the option to confidentially report compliance violations. This service is an important way to preserve our highest ethical values and maintain the trust of our customers and the public.

2. Scope

Our reporting channels offer our employees, our business partners and authorized third parties (e.g. customers) the opportunity to report compliance violations confidentially and (to the extent permitted by law) anonymously. The report may include information on criminal offenses (e.g. corruption, bribery, fraud, money laundering) or on competition or antitrust law violations as well as information on violations of EU law or applicable national law in the DOUGLAS business context, including possible human rights violations or environmental offenses.

3. Whistleblower protection

Whistleblowers are not disadvantaged if they make a report in good faith. However, the report should only be made in justified cases in order to enable professional handling. All messages and the identity of the whistleblower will be processed confidentially and in compliance with data protection law by the DOUGLAS Compliance Officers. They are adequately trained and bound to secrecy. Proper documentation of case management from receipt to case closure is ensured (for possible litigation).

4. Reporting channels

Reports can be submitted to DOUGLAS in various ways (in person, by telephone, by mail or by e-mail). We also offer an external whistleblowing system that is accessible 24/7. This is a web portal provided by "WhistleB, Whistleblowing Center", an external partner, through which employees, our business partners and authorized third parties may submit reports confidentially (and anonymously, if permitted by law in the respective country). Reports to the whistleblowing system are submitted via a web-based questionnaire. Communication is password-protected and encrypted, ensuring compliance with the legal requirements for a whistleblowing system in the various countries. Personal data is processed in compliance with the law. The message is automatically integrated into a database for case processing in the whistleblower system and processed confidentially by the Compliance Officers. The

whistleblower system enables secure and direct communication, even with anonymous whistleblowers.

- a) Our employees can submit their reports via link to the **Douglas whistleblowing system for employees: [WhistleB Whistleblowing System](#)**
Reports will be handled confidentially by the Country Compliance Officers.

- b) For our business partner or authorized third parties, we offer a (currently) bilingual link to our external whistleblowing system on the DOUGLAS corporate website. Messages may be submitted via link to the **Douglas whistleblowing system for external parties: [WhistleB Whistleblowing Centre](#)**

All reports via this link are sent directly to the DOUGLAS Group Compliance Office, which is located at the DOUGLAS headquarters in Düsseldorf, Germany, and processes the reports confidentially. If external whistleblowers prefer to report in person, the DOUGLAS Group Compliance Office will accept telephone, postal or e-mail reports during normal office hours.

Contact details of the DOUGLAS Group Compliance Office:



+49 211 16847 222



Luise-Rainer-Str. 7-11
40235 Düsseldorf, Germany



compliance@douglas.de

5. Case handling

Incoming reports of compliance violations are handled Douglas-wide according to a predefined case handling process.

- a) After receipt of a report, the responsible Compliance Officers first assess in a preliminary assessment whether the reported facts actually constitute a compliance case as defined above. This includes checking whether sufficient concrete information is available to process the case. The whistleblower will receive an acknowledgement of receipt **within a maximum of seven days**. If it is not a compliance case, the whistleblower will be informed and the compliance officer will pass the matter on to the relevant department for processing or amicable settlement in consultation with the whistleblower.

- b) In the event of a compliance case, the Compliance Officers shall initiate an **objective and independent investigation of the facts** by a suitable department/investigative function (Internal Audit, Legal, Human Resources, etc.) within the company.
- c) The report as well as other information, documents and findings on the compliance violation are **documented in the whistleblower system** by the Compliance Officer during the investigation in order to ensure proper evidence for a possible later legal dispute. Rejected cases, on the other hand, will be completely deleted after an appropriate waiting period.
- d) Based on the results of the investigation, **suitable remedial or settlement measures** are determined as part of a joint approach by the management, HR department and Compliance Officers. This also includes an assessment of whether it is advisable to involve investigative authorities or whether there is a duty to report to supervisory authorities.
- e) Management and HR management then decide on and implement the **sanction or remedial measures against the perpetrator** and inform the Compliance Officers accordingly in order to jointly ensure that similar cases are sanctioned in the same way.
- f) The conclusion of the compliance case is duly documented by the Compliance Officer in the case management database in the whistleblowing system. The whistleblowers are informed within a **maximum of three months** about the outcome of the investigation (and, insofar as there are no data protection concerns, also about the measures taken).

Douglas GmbH - Headquarter
Group Compliance Office

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