



# Whistleblowing

## Policy

## At a glance

The DOUGLAS Group is committed to adhering to all applicable laws and internal guidelines. Compliance violation can jeopardize long-term business success. Early reporting and thorough investigation are therefore essential. Everyone is encouraged to report compliance violations to the Compliance Organization.

### Who can report?

Any person with knowledge of actual or potential misconduct by employees of the DOUGLAS Group, our suppliers, or third parties associated with the DOUGLAS Group.

### Where to report?



Whistleblowing Tool:

<https://douglas.integrityline.app/>



Local contact points (see last page) -

Group Compliance Office:



[compliance@douglas.de](mailto:compliance@douglas.de)



+49 211 16847 222

### What to report?

In particular, but not limited, the following compliance violations:

- › Bribery / corruption
- › Fraud
- › Asset misappropriation (embezzlement)
- › Money laundering
- › Competition or antitrust violations
- › Insider trading / market manipulation
- › Sexual harassment
- › Human rights violations
- › Environmental violations
- › Violations of DOUGLAS Group Policies or Code of Conduct

### What happens then? - Process

Confirmation of receipt	Pre-Assessment	Investigation & Case management	Closing
<p>Report received</p> <p>Confirmation of receipt within seven working days</p>	<p>Assessment of validity and applicability</p> <p>If necessary, obtain further information from whistleblower</p>	<p>Objective investigation</p> <p>Remedial or settlement measures</p> <p>Status report within three months</p>	<p>Recommendation on measures</p> <p>Documentation and information to whistleblowers</p>

### Protection of whistleblowers

The DOUGLAS Group protects all whistleblowers from any form of retaliation. Any disadvantage, discrimination or intimidation of whistleblowers resulting from a report constitutes a compliance violation against this policy and the EU Whistleblower Protection Act and will be sanctioned. Both the identity of the whistleblower and the reported issue are handled confidentially and in line with data protection regulation

## **1. Introduction**

The DOUGLAS Group acts in accordance with applicable laws and regulations. This is not only an integral part of our corporate culture, but also the foundation for sustainable business success.

The DOUGLAS Compliance Organization supports adherence to applicable laws and regulations through targeted measures and thus protects the company from reputational and financial damage. Despite many preventive measures, misconduct can still occur. Early detection and thorough investigation of compliance issues helps to prevent disadvantages for the DOUGLAS Group and its employees. Everyone is therefore expected to report potential compliance violations to the Compliance Organization.

## **2. Purpose**

This policy describes the process of the DOUGLAS Group's whistleblower system and the protection of whistleblowers. It outlines the types of violations that can be reported within the scope of the whistleblower system and also serves as rules of procedure for complaints in accordance with the German Supply Chain Due Diligence Act.

## **3. Scope**

In particular - but not limited to - the following compliance violations can be reported via the DOUGLAS Group's whistleblower system:

- Bribery / corruption
- Fraud
- Asset misappropriation (embezzlement)
- Money laundering
- Competition and antitrust violations
- Insider trading / market manipulation
- Sexual harassment
- Human rights violations
- Environmental violations
- Violations of DOUGLAS Group policies or Code of Conduct

## **4. Reporting channels**

### **4.1. Internal reporting channels**

All whistleblowers are encouraged to contact the Compliance Organization of the DOUGLAS Group. Many issues can be efficiently resolved internally. The following internal options are available:

#### **4.1.1. Whistleblowing tool**

The Whistleblowing tool can be accessed via the following link:  
<https://douglas.integrityline.app/>



The Whistleblowing tool allows confidential and - if desired - anonymous communication in 25 languages between the whistleblower and the Compliance Organization. It is not hosted on DOUGLAS Group's company servers.

#### **4.1.2. Local contact points**

An overview of local contact points is listed in Appendix I.

### **4.2. External reporting channels**

Reporting to external bodies is also possible. An overview of external reporting channels can be accessed via the following link: [external reporting channels](#)

## **5. Handling of reports**

### **5.1. Process of case handling**

Incoming reports are treated according to a predefined process:

#### **5.1.1. Confirmation of receipt**

The whistleblower receives an acknowledgement of receipt no later than seven working days after the report has been received.

#### **5.1.2. Pre-Assessment**

The responsible Compliance Officer assesses whether the issue constitutes a potential compliance violation and whether all necessary information is available. If required, further information is obtained from the whistleblower. If there is no potential compliance violation, the whistleblower is informed, and the case is closed. If the facts are sufficient, a thorough investigation is carried out.

#### **5.1.3. Investigation and case management**

The investigation of a potential compliance violation is conducted objectively, transparently, and independently by Compliance Officers. Relevant documents are reviewed, and interviews are conducted with witnesses and other individuals as required. If necessary, electronic data is also analyzed. To support the investigation, relevant departments of the DOUGLAS Group may be involved if needed. The report as well as supporting documentation and findings are stored. Based on the investigation results, suitable remedial or settlement measures are determined and implemented. No later than three months after receiving the report, the whistleblower is informed about the status.

#### **5.1.4. Closing**

The conclusion of the compliance case is documented by the responsible Compliance Officer. The whistleblower receives a notification regarding the conclusion of the matter.

## **5.2. Responsibilities and cooperation**

### **5.2.1. Responsibility of the Compliance Organization**

The Compliance Organization provides DOUGLAS Group employees with information on how to use the whistleblower system. Compliance Officers who receive reports are thoroughly trained and obliged to handle the reports confidentially. Should a Compliance Officer recognize that personal circumstances might impair their objectivity, the possible conflict of interest will be reported immediately and resolved.

### **5.2.2. Cooperation of employees**

All employees are encouraged to actively and diligently cooperate in the investigation of violations. This includes in particular:

- Prompt provision of complete and truthful information
- Cooperation with the Compliance Organization
- Maintaining confidentiality concerning the content and procedures of the investigation
- Abstaining from any interference and/or influence on the investigation.

Any compulsion to self-incriminate is excluded.

## **6. Protection mechanisms**

### **6.1. Protection of whistleblowers**

The DOUGLAS Group protects all whistleblowers from any form of retaliation. Any disadvantage, discrimination or intimidation of whistleblowers due to a report constitutes a violation of this policy and the EU Whistleblower Protection Act and will be sanctioned. Whistleblower protection does not apply to individuals who deliberately report false matters. The DOUGLAS Group's whistleblower system must be used in a responsible manner. Reports do not need to be proven – a reasonable suspicion of potential misconduct is sufficient. Assumptions or rumors can also be reported, provided they are clearly marked as such. The identity of the whistleblower and the reported issue are handled confidentially and in line with data protection regulations.

### **6.2. Protection of affected persons**

The presumption of innocence applies. Anyone affected by a report of a compliance violation is informed of the suspicion at an appropriate time, provided that such notification does not significantly impede the progress of the investigation or further measures. This notification occurs no later than after the conclusion of the investigation.

## **7. Data protection**

Personal data is stored only for as long as necessary or legally required. Afterwards, the data is deleted. Further information is available in the privacy information of the whistleblower tool.

## **8. Final remarks**

With this policy, the DOUGLAS Group fulfils the legal requirement to publish rules of procedure for the complaints procedure in accordance with the German Supply Chain Due Diligence Act. The effectiveness of our whistleblower system or complaint procedure is reviewed at least once a year and on an ad hoc basis. Findings from these reviews are used to continuously improve our whistleblower system. This policy is updated as necessary.

## Appendix I: Internal Reporting Channels of the DOUGLAS Group

In addition to the possibility to report at the group level to the DOUGLAS Group Compliance Office, the following local contact points are available within the DOUGLAS Group.

Country	Local contact points
Andorra	compliance@douglas.es
Austria	<a href="https://douglas.integrityline.app/">https://douglas.integrityline.app/</a>
Belgium	compliance@douglas.nl
Bulgaria	compliance@douglasbeauty.bg
Croatia	compliance@douglas.hr
Czech Republic	compliance@douglas.cz
Douglas Group Compliance	compliance@douglas.de
Estonia	compliance@douglas.lv
France	compliance@nocibe.fr
Germany	<a href="https://douglas.integrityline.app/">https://douglas.integrityline.app/</a>
Italy	compliance@douglas.it
Latvia	compliance@douglas.lv
Lithuania	compliance@douglas.lv
Monaco	compliance@nocibe.fr
Netherlands	compliance@douglas.nl
Poland	etycznie@douglas.pl
Portugal	compliance@douglas.pt
Romania	compliance@douglas.ro
Slovakia	compliance@douglas.cz
Slovenia	compliance@douglas.si
Spain	compliance@douglas.es
Switzerland	compliance@douglas.ch





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