

## Reporting Compliance Concerns

### Our principle

We accept the challenges of ethical conduct. We will support each other in keeping our commitments to further the goals of HOERBIGER. We will speak up whenever things need to be corrected or improved!

### Policy

HOERBIGER conducts its business in compliance with the laws and regulations of the countries in which it does business. We always act with integrity and in compliance with all applicable laws!

HOERBIGER encourages all Personnel to highlight business issues which require attention. This especially includes possible non-compliance situations, such as

- bribery and corruption,
- violation of competition laws,
- violation of international trade laws,
- abuse of power and conflict of interest,
- damage to the environment,
- unsafe working conditions,
- discrimination or harassment,
- inaccurate financial reporting or breach of internal controls, and
- any other breach of law, regulations or internal rules.

### Implementation

Concerns may be raised with local management. In addition, HOERBIGER Personnel are encouraged to escalate their concerns – up to a member of the Executive Board – or to inform Corporate Compliance.

Concerns or complaints may also be filed on the confidential electronic reporting platform, HOERBIGER Integrity Line (<https://hoerbiger.integrityline.org>). It is possible to file complaints anonymously.

### Investigation of complaints

Corporate Compliance and Corporate Audit will review and investigate all concerns promptly, confidentially and diligently. The concerned Personnel will be informed of the outcome of investigations as soon as reasonably practicable and subject to any legal limitations.

The identity of HOERBIGER Personnel who file a report shall be kept confidential. Under certain circumstances, there may be a legal obligation to disclose the identity of the Personnel who filed a report. In such a situation HOERBIGER will notify the affected Personnel in advance and provide all reasonable counsel and assistance.

### No retaliation

HOERBIGER Personnel shall be able to report in good faith instances of wrongdoing by other employees at any level without fear of reprisal. They shall have confidence that their concerns will be investigated objectively and dealt with properly.

HOERBIGER prohibits retaliation against any Personnel who report a suspected compliance violation in good faith, or who assist in a compliance investigation. Any Personnel found to be victimizing a colleague for reporting a compliance concern or deterring a colleague from reporting non-compliance may be subject to disciplinary action. Also, Personnel who intentionally or knowingly make false or misleading allegations are in violation of this Policy and will be subject to disciplinary action.