

Whistleblowing Policy

Purpose

The company has established the following whistleblower policy according to the European Directive 2019/1937 on the protection of persons who report breaches of Union law in connection with the respective national law.

This policy assures protected communications for individuals who report violations of legal requirements, as well as violations of the Envipco's internal Code of Conduct.

Scope

The whistleblower system is available to all Envipco employees and temporary workers. Furthermore, persons in frequent and direct contact with the work environment are encouraged to report violations of law or the internal code of conduct.

Definitions

Whistleblower: The whistleblower is the person reporting an incident. This person is only known to the persons responsible for the whistleblowing process.

Whistleblowing officer: The whistleblowing officer is the person responsible for following up reports from the whistleblower. This person is an objective party.

Reprisals: Reprisals are all kinds of reactions to a reporting which could cause unfair disadvantages to the whistleblower in a professional context.

Internal reporting office: The internal reporting office is the point of contact inside Envipco. The responsible persons are obliged to follow up the reporting while keeping the reporting person and all mentioned persons strictly confidential. Reports can address a violation of law or the internal code of conduct of Envipco.

External reporting office: External reporting offices are public authorities and only responsible for reporting regarding violations of law.

Reporting Obligations and Reporting Needs

All employees are required to contact a reporting office in the event of violations of the law or a reasonable suspicion thereof. In any case the internal reporting office shall be the preferred communication channel. To make this possible for violations in connection with business processes, an e-mail address has been set up which employees and other affected parties can contact. In the case of violations of the law, both internal and external reporting offices can be contacted. The internal reporting office should always be preferred for initial reports. The external offices are named separately and differ from country to country.

Furthermore, employees and other affected parties are encouraged to report violations of Envipco's internal Code of Conduct. This is crucial to ensure positive and trusting cooperation.

If there is an existing or justified suspicion of a violation of law or a violation of the Envipco Code of Conduct, a report must be submitted to the following e-mail address:

whistleblower@envipco.com

Only the officers have access to the incoming reports, which are subject to full discretion. The whistleblower does not have to fear any disclosure of personal data or third parties mentioned in the report. Such reports cannot cause any reprisals towards the whistleblower or a third party. The whistleblower can only be held responsible for false reports made intentionally or through gross negligence.

Process

To report legal violations or violations of the Envipco's Code of Conduct, the whistleblower can contact persons of trust within the company, who may be the respective manager or managing director. With this policy, the whistleblower also has the option of reporting the matter to the company's designated officers. By sending the report to the e-mail address "whistleblower@envipco.com", these officers are notified, are obligated to provide regular feedback on the case to the whistleblower and notify the whistleblower of any new developments and investigations relating to the respective case, provided the information is not subject to confidentiality. The first response from the whistleblowing officer should be received by the whistleblower within the first seven days of reporting. The officers are also available for contact in person on request.

The preferred language of communication is English, although whistleblowers may report incidents in their preferred language in order to ensure that there are no misunderstandings and to enable them to express themselves more freely. However, incidents reported in another language other than English, will be translated by an external party as the whistleblowing officer will be responding to the reports in English.

Data Protection Measures

When reporting a matter, the whistleblower usually provides personal data at least by stating his or her full name. This data is necessary to enable existing queries to be made in order to resolve the matter. It is treated as strictly confidential, so that only the authorized persons can access the whistleblower's personal data. The same applies to any persons named in a report or information that may indicate a person. No data will be passed on without the consent of the persons concerned. An exception exists if a law enforcement agency requests the information.

Personal data provided in a notification is collected and processed for the purpose of pursuing and clarifying the facts of the case. All information related to the case is deleted no later than three years after the facts of the case have been clarified.