

# WHISTLEBLOWER PROCEDURE

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## PREFACE

The topic of whistleblowing has a special significance in the compliance efforts of PROLICHT. In our Code of Ethics, we commit ourselves to uphold our values and to comply with applicable national and international law. If stakeholders violate this Code of Ethics or applicable law, whistleblowing provides an opportunity to report the violation within the company.

As a company with fewer than 249 employees, there is currently no acute need for us to implement a whistleblower procedure. According to the EU Directive, the implementation deadline for setting up an internal reporting channel ends on December 17, 2023. Nevertheless, we have already decided to give our employees the opportunity to report wrongdoing within the company.

## 1 INITIAL SITUATION

The definition of the whistleblower procedure encourages employees to report problems relating to business ethics in the company. This includes, for example, corruption, problems with environmental protection or product safety. A detailed list of the areas of application can be found in section 2.1. Whistleblowers are also protected by applicable EU law (Art 19 Directive EU 2019/1937) from personal disadvantages or reprisals for submitting a report.

The present whistleblower procedure is based on the EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report infringements of Union law, as well as the draft Federal Act on the Procedure and Protection in Case of Information on Infringements in Certain Areas of Law (Whistleblowinggesetz- WbG).

## 2 WHISTLEBLOWER PROCEDURE AT PROLICHT

Based on the above-mentioned EU Directive (Art 9 RL EU 2019/1937), PROLICHT provides for the following procedure for dealing with whistleblowers:

- Receipt of a report via the reporting system.
- Documentation of the report.
- Confirmation of receipt of the report to the whistleblower within 7 days.
- Designation of an impartial person or department responsible following up the report.
- Processing of the report (internal inquiries or investigations).
- The whistleblower will be informed comprehensively about the follow-up measures no later than 3 months after conformation of the report.

## 2.1 WHISTLEBLOWER

A whistleblower is usually someone who expresses suspicion of misconduct in a company.

According to EU law, employees, former employees, interns, self-employed persons, employees of suppliers and business partners who work with PROLICHT are protected by the directive. In addition, third parties who have a close relationship with the whistleblower (e.g. family members) are also particularly protected.

## 2.2 AREA OF APPLICATION

The following violations of national and Union law fall within the scope of the Directive:

- Preventing, and combating criminal acts in the field of corruption.
- Public procurement
- Financial services, financial products and financial markets, and prevention of money laundering and terrorist financing
- Product safety and conformity
- Transport safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data and security of network and information systems.

It should be noted that personal grievances such as bullying or harassment do not fall within the scope of the Whistleblowing Directive. This is explicitly communicated to employees on the intranet. The intranet also contains information on which complaints procedure applies in such cases.

## 2.3 PROTECTION OF WHISTLEBLOWERS

PROLICHT is obligated to observe the principle of confidentiality with regard to the reports. The identity of the whistleblower will not be made public to anyone other than authorized persons without express consent.

Whistleblowers are also protected by applicable EU law (Ch 6 RL EU 2019/1937) from civil, criminal or administrative liability based on the report. In addition, consequences under labor law and reprisals are prohibited.

### 3 IMPLEMENTATION OF THE INTERNAL REPORTING CHANNEL

The reporting channel is implemented with the help of the whistleblower solution "Trusty" (<https://prolicht.trusty.report/>). The tool consists of a frontend, which employees can use to submit reports in written form, in compliance with the GDPR and optionally anonymously, as required by the EU Directive (Art. 5 para. 2a RL EU 2019/1937). Furthermore, a backend is available for case management and documentation of the reports. Only authorized employees (see point 3.1) have access in order to guarantee the confidentiality of the reports.

The link to the reporting channel is published on the intranet and is always thus available to all employees, regardless of language, within the company network. Employees are also informed about the reporting channel and the whistleblower procedure on the intranet.

#### 3.1 RESPONSIBILITIES

Only Mag. (FH) Eva Maria Dengg (HR Management) is authorized to access the reports and the case management.

Details and information on the whistleblower procedure at PROLICHT can be requested from the "Human Resource" team.

## 3.2 IMPLEMENTATION IN THE INTRANET

### Whistleblowing

#### What is whistleblowing?

Whistleblowing is the reporting of grievances and incidents within a company. You have the possibility, for example, to report information about corruption, fraud or other illegal activities within the company via our secure channel (see box below). We are grateful for every report!

#### What breaches can be reported?

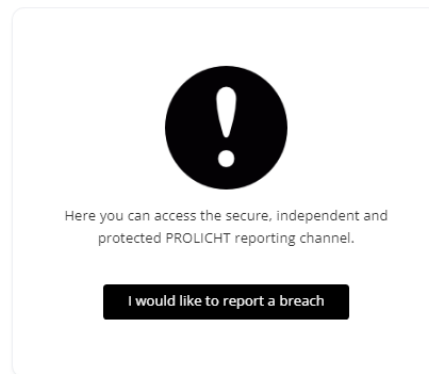
The following violations of national and Union law fall within the scope whistleblowing:

- Preventing, preventing and combating criminal acts in the field of corruption
- Public procurement
- Financial services, financial products and financial markets, and prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health • Consumer protection
- Protection of privacy and personal data and security of network and information systems

**CAUTION! Personal grievances such as bullying or harassment do not fall within the scope of the whistleblowing procedure (See below).**

Want to learn more about whistleblowing or unsure if you should report an incident? Then check out the "Whistleblowing FAQs" section below.

*Figure 1: INTRODUCTION TO THE TOPIC OF WHISTLEBLOWING*



*Figure 2: LINK TO THE INTERNAL REPORTING CHANNEL*

#### FAQs on whistleblowing

Can I remain anonymous?	▼
What violations can be reported?	▼
I feel harassed or bullied, can I also report these incidents via the platform?	▼
How do I create a report?	▼
How can I access my mailbox?	▼
What is the further procedure after a report?	▼
Who has access to my message?	▼
Should I expect legal problems after reporting?	▼

*Figure 3: FAQs ON WHISTLEBLOWING*



Welcome to Trusty, the secure and protected internal reporting channel of Prolicht GmbH (hereinafter: the organization) for communicating information on suspected breaches within the organization.

The usage of this web application is confidential and you are not required to disclose your identity, should you wish to remain anonymous. For details on procedures regarding internal reporting and follow-up please refer to the organization's policies and the applicable national law.

Make a report

The report should be made in good faith. Please note, mandatory questions are marked with an asterisk (\*) and you will not be able to proceed without filling in the respective fields. After submitting the report, your username and password will be automatically generated and displayed on your screen. Please write them down as you will need them to enter your inbox and follow up on your report.

Your inbox

Here you can follow the status of your report, including confirmation of its receipt, continue secure communication with and receive feedback from the organization.

FAQ

This application is not a part of the website or intranet of the organization, but is managed by ABC Transparency GmbH. This is not an emergency service. Please contact the relevant authorities (like police) in case of immediate danger!

Figure 4: INTERNAL REPORTING CHANNEL (TRUSTY)

### 3.3 IMPLEMENTATION IN THE INTRANET (GERMAN)

#### Whistleblowing

##### Was ist Whistleblowing?

Unter Whistleblowing versteht man das Melden von Missständen und Vorfällen in einem Unternehmen. Du hast die Möglichkeit, beispielsweise Informationen über Korruption, Betrug oder sonstige illegale Tätigkeiten innerhalb des Unternehmens über unseren sicheren Kanal zu melden (siehe Box unten). Wir sind dankbar um jeden Meldung!

##### Welche Verstöße können gemeldet werden?

Folgende Verstöße gegen nationales und Unionsrecht fallen in den Anwendungsbereich der Richtlinie:

- Vorbeugung, Verhinderung und Bekämpfung strafbarer Handlungen im Bereich der Korruption
- Öffentliches Auftragswesen
- Finanzdienstleistungen, Finanzprodukte und Finanzmärkte sowie Verhinderung von Geldwäsche und Terrorismusfinanzierung
- Produktsicherheit und -konformität
- Verkehrssicherheit
- Umweltschutz
- Strahlenschutz und kerntechnische Sicherheit
- Lebensmittel- und Futtermittelsicherheit, Tiergesundheit und Tierschutz
- Öffentliche Gesundheit
- Verbraucherschutz
- Schutz der Privatsphäre und personenbezogener Daten sowie Sicherheit von Netz- und Informationssystemen

**ACHTUNG! Persönliche Missstände wie Mobbing oder Belästigung fallen nicht in den Anwendungsbereich des Whistleblowing-Verfahrens (Siehe unten).**

Möchtest du mehr über das Thema Whistleblowing erfahren oder bist du unsicher ob du einen Vorfall melden sollst? Dann sieh dir den Abschnitt „FAQs zum Thema Whistleblowing“ weiter unten an.

Figure 5: INTRODUCTION TO THE TOPIC OF WHISTLEBLOWING (GERMAN)

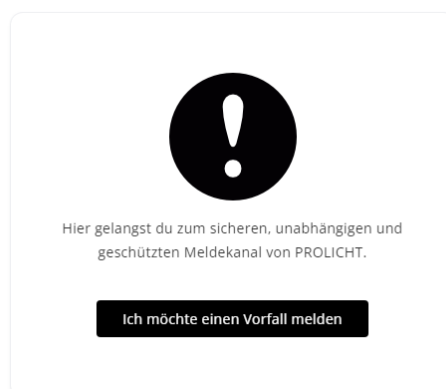



Figure 6: LINK TO THE INTERNAL REPORTING CHANNEL (GERMAN)

## FAQs zum Thema Whistleblowing

Kann ich anonym bleiben?	▼
Welche Verstöße können gemeldet werden?	▼
Ich fühle mich belästigt oder gemobbt, kann ich diese Vorfälle auch über die Plattform melden?	▼
Wie erstelle ich eine Meldung?	▼
Wie kann ich auf mein Postfach zugreifen?	▼
Wie sieht der weitere Ablauf nach einer Meldung aus?	▼
Wer hat Zugriff auf meine Meldung?	▼
Muss ich mit rechtlichen Problemen nach einer Meldung rechnen?	▼

Figure 7: FAQs ON WHISTLEBLOWING (GERMAN)



EN DE [User log in](#)

Willkommen beim Trusty, sicheren und geschützten internen Meldekanal von Prolicht GmbH (nachfolgend: die Organisation) zur Übermittlung von Informationen über vermutete Verstöße innerhalb der Organisation.

Die Nutzung dieser Webanwendung ist vertraulich und Sie sind nicht verpflichtet, Ihre Identität preiszugeben, sollten Sie anonym bleiben wollen. Einzelheiten zu den Verfahren der internen Meldungen und Nachverfolgung entnehmen Sie bitte den Richtlinien der Organisation und dem geltenden nationalen Recht.

[Meldung erstellen](#)

Die Meldung sollte in gutem Glauben erfolgen. Bitte beachten Sie, dass Pflichtfragen mit einem Sternchen (\*) gekennzeichnet sind und Sie nicht fortfahren können, ohne die entsprechenden Felder auszufüllen. Nach dem Absenden des Berichts werden Ihr Benutzername und Ihr Passwort automatisch generiert und auf Ihrem Bildschirm angezeigt. Bitte notieren Sie sich diese, da Sie sie benötigen, um auf Ihren Posteingang zuzugreifen und Ihren Bericht weiterzuverfolgen.

[Ihr Posteingang](#)

Hier können Sie den Status Ihrer Meldung verfolgen, einschließlich der Bestätigung des Empfangs, die sichere Kommunikation mit der Organisation fortsetzen und Feedback von ihr erhalten.

[HÄUFIGE FRAGEN](#)

Diese Anwendung ist kein Teil der Website oder des Intranets der Organisation, sondern wird von der ABC Transparency GmbH verwaltet. Es handelt sich nicht um einen Notdienst. Bitte wenden Sie sich bei unmittelbarer Gefahr an die zuständigen Behörden (wie die Polizei)!

Figure 8: INTERNAL REPORTING CHANNEL (TRUSTY) (GERMAN)