

Rules of Procedure

Whistleblowing System

Compliance LD-CP

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1 Which cases can be reported?

In principle, any type of compliance violation can be reported, in particular any suspicion of fraudulent or unethical behavior that constitutes a serious violation of HEIDELBERG's Code of Conduct, as well as any violations of applicable laws. Violations by HEIDELBERG suppliers can also be reported. Examples include:

- Harassment and discrimination
- Bribery and corruption
- Financial irregularities
- Human rights violations
- Environmental offenses
- Unauthorized disclosure of information to third parties.

2 What should a report contain?

The report should describe the situation as accurately as possible. The more precise the information, the easier and faster it will be to investigate the report. To help you, you can use the 5 W questions (what, who, where, when, and how).

3 How is my anonymity guaranteed and feedback provided?

We will treat all reports submitted as strictly confidential. Reports can be submitted anonymously if desired. Even if a report is submitted anonymously, the whistleblower will receive access data with which they can track the status of the case in the login area and communicate with the person handling the case.

4 How does the web-based reporting process work?

Reports can be submitted online via the following link:

heidelberg.reporting-channel.com

The language can be selected in the top right-hand corner. A new report can be submitted using the “New report” button, and cases that have already been submitted can be accessed using the “To login area” button (the login details provided after submitting the report are required for this).

The report is submitted in three steps. In the first step, “Create report,” you can enter the actual case information. The description of the facts is entered in a free text field. You must also specify which Heidelberg company is affected. Additional questions about the time and place of the reported incident are optional. You also have the option of uploading documents or files and submitting a voice message. If desired, this can be distorted to make identification by voice more difficult.

In the second step, “Contact details (optional),” you can provide your contact details, but it is also possible to submit an anonymous report. If you do not provide an email address, you will

not be able to receive notifications about the current processing status. Regardless of this, you can view the status of your report at any time in your login area (even for anonymous reports). The login details (username and password) will be displayed after you submit your report. These login details are generated automatically and are anonymous to the company.

In the final step, “Review and send,” a summary of the information you have entered is displayed once again. The report is only submitted when you click the “Send report” button.

5 How does HEIDELBERG verify the information provided?

Reports received are reviewed by the Compliance Office to determine whether an investigation is necessary. All reported cases are properly documented. In each case, the whistleblower receives confirmation of receipt of their report within 7 days.

Not every report must lead to the initiation of an investigation. In the event of a rejection, a brief explanation is provided to the whistleblower. Reports that do not lead to an investigation may occur in the following cases:

- There is insufficient information for a proper investigation and there is no possibility of obtaining further information.
- There is reasonable suspicion that the report was made in bad faith. In such a case, the reason for rejecting the case must be documented in the CMS.

If an investigation is initiated, the case is assigned to the responsible case handler depending on the facts of the case. The case handler conducts the investigation and takes all internal or external steps to adequately consider all circumstances of the case. This includes, among other things, determining the facts, reviewing the case, and communicating with the whistleblower or other parties involved.