

# Rule 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 the HEIDELBERG Code of Conduct, as well as any violations of applicable laws. Violations by HEIDELBERG suppliers can also be reported. Examples include, among others:

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

## 2 What should a message contain?

The report should describe the situation as precisely as possible. The more precise the information, the easier and quicker it will be to investigate the report. You can use the 5 W questions (what, who, where, when and how) as a guide.

## 3 How is my anonymity guaranteed and how will feedback be provided?

We will treat all reports submitted in strict confidence. The report can be submitted anonymously if desired. Even if a report is submitted anonymously, the whistleblower will receive access data, in particular a case number. The case number can be used to track the status of the case and communicate with the processor.

## 4 How does the web-based notification process work?

The following link can be used to submit web-based information:

<https://heidelbergerdruckmaschinen.speakup.report/de-DE/speakup/home>

The whistleblower must first select the respective country and then the desired language. An access code, which is displayed on the page, must then be entered. The whistleblower can now select whether a new report is to be submitted or whether a report that has already been submitted is to be processed further. When submitting a new report, it can be entered in a free text field and attachments can also be uploaded.

After entering the message, a password must be created. Together with the case number, which is then displayed, the password is required to be able to log back into the system later. This allows feedback on case processing and further information on the case to be entered into the system.

## 5 How does the telephone notification process work?

Country-specific telephone numbers have been set up for telephone reporting (telephone list in the appendix). First, the access code for Heidelberger Druckmaschinen AG must be entered. This is 109677.

Please note: Calls are not answered by humans, but the message is recorded on tape. This is then written down, translated and forwarded to the relevant department. As this is a freely spoken message, we strongly advise you to write down the text of the message before calling. Once the message has been recorded, an individual case number is created. Together with the self-set password, this is necessary to be informed about the processing of the case and to be able to communicate with the responsible investigator. The access data must be treated confidentially.

## 6 How does HEIDELBERG check the information provided?

All reports are first processed by our platform provider and translated if necessary. The reports received are then reviewed by the Compliance Office to determine whether an investigation is required. All reported cases are properly documented. In all cases, the reporting person will receive an acknowledgement 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 given to the person making the report. Reports that do not lead to an investigation may occur in the following cases:

1. There is insufficient information available for an adequate investigation and there is no possibility of obtaining further information;
2. There is reasonable suspicion that the report was made in bad faith. In such a case, the reason for the rejection of the case must be documented in the CMS.

If an investigation is initiated, the case is assigned to the responsible investigator depending on the facts of the case. The investigator conducts the investigation and takes all internal or external steps to adequately consider all circumstances of the case. This includes determining the facts, reviewing the case and communicating with the whistleblower or other parties involved. Upon completion of the investigation, the investigator prepares an internal report and a proposal for further action, which is sent to the Compliance Office.

## SpeakUp: Overview of local phone numbers

Country	Local phone number	Country	Local phone number
AUSTRALIA	0061 2 8284 6262 *	MALAYSIA	0060 3 7724 3136 *
AUSTRIA	0800 909 683	MEXICO	0052 55 4780 6198 *
BELGIUM	0800 89 326	NETHERLANDS	0031 10 700 75 03 *
BRAZIL	0055 11 4700 8838 *	NEW ZEALAND	0064 9 913 5892 *
CANADA	001 514 395 0496 *	PHILIPPINES	1800 8394 8474
CHINA	400 1201 842 *	POLAND	800012953
CZECH REPUBLIC	800 050 833	SINGAPORE	0065 6403 7051 *
DENMARK	0045 43 31 09 61 *	SLOVAKIA	0800 113 418
ESTONIA	00372 609 3008 *	SOUTH AFRICA	0027 21 427 7937 *
FRANCE	080 554 3753	SPAIN	0034 900 031 156 *
GERMANY	0800 1818 952	SWEDEN	020 160 4703
HUNGARY	06 809 845 89	SWITZERLAND	080 000 5691
INDIA	0008 0005 03159	TAIWAN, GREATER CHINA	00886 2 7743 8912 *
INDONESIA	0062 21 8063 0074 *	THAILAND	0066 2 844 9693 *
IRELAND	1800 800 636	TURKEY	0080 04488 28602
ITALY	800 147 694	UNITED KINGDOM	080 0022 4118
JAPAN	0081 3 6627 0734 *	UNITED STATES	001 669 288 7154 *
KOREA(SOUTH)	0082 2 3700 5146 *		