

Guideline Whistleblower Protection Act

confer relies on standards of conduct and value to create an environment for its employees and business partners that is characterized by respect, honesty, fairness, and responsibility. These standards of conduct and values are based on legal requirements and additional internal policies, and are outlined in the confer Code of Conduct.

Confer's employees and business partners play an important role in maintaining these standards. In many cases, you will be the first to notice or become aware of a violation of our standards, or even be personally affected. confer does not want to leave you alone in such a situation; instead, we encourage and support you to report such incidents. This report can also be made anonymously.

Such a report can be made via the email address **compliance@confer-gmbh.de**. This email address can be used not only for tips but also for questions and clarifications.

confer is aware that whistleblowing is not always supported, and may sometimes be viewed critically or even rejected. However, we emphasize that the purpose is to provide an opportunity to raise concerns in a protected environment, not to denounce or publicly shame other employees. When used correctly, a whistleblower system promotes a values-based and ethical corporate culture and strengthens the reputation and trust in a company both internally and externally. The aim is therefore to encourage all employees and business partners to report misconduct and breaches of values, thereby helping us to do what is "right" as described in the Code of Conduct.

In accordance with this policy, reports can be made about any breach of the law or our behavioral and value standards as outlined in our Code of Conduct. This includes breach of laws or internal policies, cases of discrimination or harassment, damage to reputation or assets, health or safety risks, or other forms of misconduct.

What is "Whistleblowing"?

"Whistleblowing" refers to the reporting of misconduct or violations of company policies of significant relevance by an employee or business partner to an official authority within the company. Whistleblowers who make such reports with the intention of correcting the misconduct and/or breach of values and ensuring compliance will be protected by law from discrimination by other employees or the employer, such as disciplinary actions, harassment or intimidation. confer will also protect and support any person who, in good faith, reports a potential breach of our standard of conduct and values. This also applies if the reported suspicion turns out to be unsubstantiated. However, "whistleblowing" does not include the intentional reporting false facts or incidents with the intention to deliberately harm others. Persons who submit such reports are not protected under the legal whistleblower protections, and confer will not support such persons, but on the contrary will pursue and, if necessary, sanction deliberately false reports within the scope of the law.

A link to the whistleblower Protection Act can be found here:
<https://www.gesetze-im-internet.de/hinschg/index.html>

Reporting Possible Violations

If you become aware, or if you have reasonable suspicion of a violation of our standards of conduct and values as outlined in the Code of Conduct, or any violation of the law, you should first consider the following:

- Check if you can discuss the matter in a personal conversation with the affected individuals. This will be often sufficient to clarify and resolve the matter. However, confer recognises that there may be situations where a personal conversation is not possible or desired. Therefore, there is no obligation to have a personal conversation before submitting a report.
- The misconduct or breach of values that you want to report should be of some significance. The whistleblower system is not intended for “trivial cases” that may constitute a breach of internal policies, but which are likely to be resolved quickly and without prejudice through a personal conversation. This is especially the case when, for example, the affected person unknowingly violated standards of behaviour and values or were unaware of legal requirements.
- There should be at least reasonable indications of the misconduct or a breach of values. Mere accusations or suspicions are difficult for those receiving the information to verify and follow up on, and therefore do not help to improve the working environment for our employees and business partners. Share all the information you have, but do not conduct your own investigations to find further evidence for your suspicion.
- You will be asked to describe the incident and provide specific details. Please keep in mind that the processing will be easier for the recipients of the report the more specific your information is.
- You will receive an acknowledgment of receipt within seven days with a reference number known only to you and the recipients of your report.
- You can submit a report anonymously if desired. You can also submit the report anonymously at first - voluntarily and without any consequences - and later disclose your name during further processing. confer takes every sincere report seriously and will investigate it when there is sufficient suspicion, regardless of whether you have submitted anonymously or with your name.
- If you disclose your identity to the recipient of the report, it will be kept confidential upon your request.

Further Handling of Reports

- The report will initially be received just by the responsible contact person for the whistleblowing system. The contact person acts independently regarding to his or her responsibility for the whistleblowing system and the incoming reports and is not subject to any authority to issue instructions.

- Your report will be reviewed to determine whether the facts are plausible and whether a breach of standard of conduct or values may have occurred. If you submit an anonymous report, your personal data is not recorded, and contact can only be made if you respond using the email address you provided and the reference number given to you.
- If the report, possibly after clarifying of the issues, raises sufficient suspicion of misconduct or a breach of values, a further investigation will follow. Depending on the individual case, this may involve the involvement additional persons by the contact person or the implementation of specific investigation or search measures. confer will comply with data protection and other legal requirements.
- confer will investigate all sufficiently plausible evidence with the necessary determination, while acting fairly, appropriately, and proportionally towards all parties involved. If a breach of the standard of conduct and values is identified, disciplinary or employment sanctions may be considered, depending on the severity of the breach, in coordination with management and the manager of the offending individual. Any sanctions will be determined by confer at its own discretion within the legal limits and confer's internal policies. confer does not guarantee that actions will always be taken in the manner you, as the whistleblower, expect or perhaps wish.
- It is possible that you as whistleblower, for reasons of data protection, privacy protection for the affected person, or other legal reasons, you may not receive complete information regarding the outcome of the investigation.
- The management will be regularly informed of all reports through the above whistleblowing system and any reports resulting from it.

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