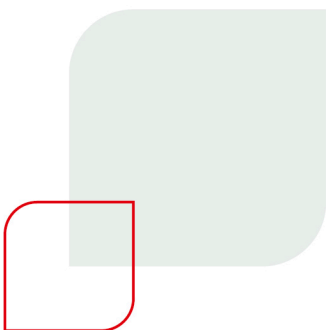
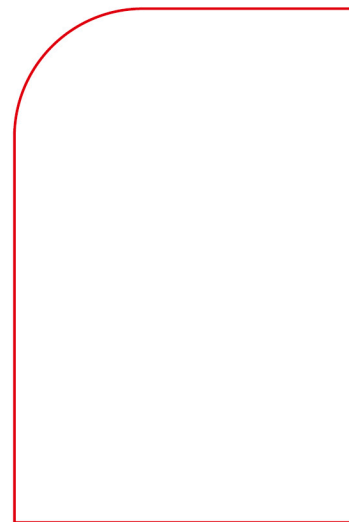


Zollner **SpeakUp** Policy

Complaint Procedure for Whistleblowers



Zollner SpeakUp Policy

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Preface

The Zollner Group of companies is obligated to ethically responsible corporate management. Adherence to the highest ethical standards is fundamental in doing so.

All business activities are based on the highest standards of integrity. We pursue a zero-tolerance policy for bribery, corruption, extortion and embezzlement in any form.

We remain keenly aware of our corporate responsibility to respect human rights and the respective environmental laws in our company and in the supply chain.

Combating misconduct is a critical part of this obligation.

A complaint process was implemented for this through which all concerns brought forward within the framework of this guideline are impartially and objectively reviewed and that all reporting persons are guaranteed the necessary protection.

With the fact that it is made possible for internal and external whistleblowers to speak up about unethical or illegal conduct, we promote a bona fide “speak-up culture” – a culture of trust, respect and honesty.

The most important information surrounding the Zollner SpeakUp complaint process will be illustrated in the following.



Ludwig Zollner
Board Spokesman

Zollner SpeakUp Policy

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1 Cases for application

This guideline regulates the investigation of possible violations against human rights, laws, the Zollner Code of Conduct and internal guidelines as well as handling complaints and tips.

The following list contains examples of misconduct in the sense of this guideline. We make no claim that this list is complete. Possible cases for reporting here are:

- **Abuse of Human Rights**, like indications of modern slavery, child labor, human trafficking, forced labor, indentured labor or compulsory labor in connection with companies within the Zollner Group of companies or a Zollner business partner
- **Noncompliance with fair workplace principles or employment law**, including discrimination, unequal treatment, harassment and threats, like abuse of power and disregard of the freedom of association
- **Violations against workplace safety regulations, hazards to health and safety at the workplace** due to obviously inadequate safety standards, excessive physical and mental fatigue from unsuitable workplace organization
- **Noncompliance with environmental requirements, waste of natural resources**, like disposal of hazardous waste, bringing about harmful changes to the soil, water pollution, air pollution, harmful noise emissions or excessive water consumption
- **Unfair business practices**, especially corruption, bribery, fraud and conflicts of interest, like price fixing, bid rigging, comparative advertising, deceptive product information or sales, betrayal of business or company secrets
- **Violations against local or international law** – against applicable import and export laws, money laundering and the financing of terrorism, accounting fraud, insider business or violation of intellectual property rights
- **Violations against data privacy protection and information security**
- **Noncompliance with internal guidelines or processes** of the Zollner Group of companies or **misuse of company assets**, like embezzlement, misappropriation, theft of cash, equipment, supplies or other company assets, sabotage or vandalism through destruction of company property

Topics of discontent, like personal, work-related complaints, wishes and ideas for improvement do not belong to reportable misconduct in the sense of this guideline. We encourage our employees to bring deficiencies that do not constitute a violation of the law to their management or, if needed, to Human Resources Management (HR).

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2 Reporting channels

The following options exist for reporting violations against human rights, laws and internal guidelines as well as information on tips and complaints of possible risks or nonconformities in connection with legal requirements or human rights in our company or the supply chain.

Reporting channels	Reporting channels	Reporting channels	Reporting channels
“Open Door Policy”: Leadership or Division Manager, Managing Director or Member of the Managing Board	verbal	not anonymous	internal (e.g.: employee, temporary staff)
Email: speakup@zollner.de (Corporate Compliance Team)	written/verbal	not anonymous	internal (e.g.: employee, temporary staff) and external (e.g.: supplier, customer, neighbor)
Whistleblowing system “Zollner SpeakUp” - using the SpeakUp® website: (https://zollner.speakup.report/violation) - using the SpeakUp® app	written	not anonymous or anonymous	internal (e.g.: employee, temporary staff) and external (e.g.: supplier, customer, neighbor)

Whistleblowers can turn to the internal reporting area of their choice.

All incoming reports are recorded and documented in the whistleblower system, Zollner SpeakUp.

Documentation is deleted five years after closing an action.

If an internally reported violation has not been rectified, the whistleblower has the right to turn to an external reporting office.

2.1 Zollner SpeakUp

What is Zollner SpeakUp?

Zollner SpeakUp is a whistleblower system. The SpeakUp® software is a communication tool that was developed by an external provider (People Intouch B.V. with headquarters in The Netherlands). At the same time, the software is a reporting system, where people want to report violations or misconduct at Zollner, and a secure and anonymous communication channel to the Corporate Compliance Team at Zollner Elektronik AG. Zollner is responsible for the processing of information and data shared using SpeakUp®. People Intouch only provides the cloud-based Software-as-a-Service (SaaS) for communication and ensures that SpeakUp® can be utilized the entire year, around the clock.

How can a report be submitted?

Reporting people can either leave a written message via the SpeakUp® website

(<https://zollner.speakup.report/violation>) or the SpeakUp® app (“SpeakUp® by People Intouch” app, available in the App Store/Google Play – organization code: 107665 to use the app). The functional mode of both systems is similar and easy to use:

1. **Select** the preferred **language** for the report and later communication (reports that are not drafted in English are translated into English automatically and sent in English and the original language to the Corporate Compliance Team).
2. Click on “+ **New report**” (if you already have an open report, click on “Log in”).

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3. If you report **using the SpeakUp® web application**, note the **report number** (randomly generated) and **create a password** for the report. You will need this later to check whether you have received a response. If you **use the SpeakUp® app** to report, generate a unique **6-digit PIN code**, which you will need later for a new report or to query status.
4. **Compose the report** and upload supporting documents as needed.
5. Click on **“Send report”**
(if you want to be notified as soon as you have received a response, you can enter your email address).

Can Zollner track my connection data?

No, Zollner has no access to connection data (IP addresses). However, reporting people can also use a private device at any time (smart phone or PC) instead of a Zollner device.

Tips for preparing your report through Zollner SpeakUp

- Prior to submitting your report, decide whether or not you want to remain anonymous.
- Take a bit of time and think about which and how much information you want to share. It helps to provide as many facts as possible (e.g.: when and where did the incident occur? Who are the participants/affected people? What happened, exactly?)
- If you have evidence for the case in electronic format, please attach it to your report.

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3 Responsibilities and contact people

Responsibilities for compliance and complaint management at Zollner have been defined.

Fundamentally, responsibility for the compliant and lawful behavior of our employees lies with the managing directors of foreign subsidiaries, all members of leadership and, of course, with the employees themselves.

Ludwig Zollner, Board Spokesman, was appointed to be the Compliance Director (Chief Compliance Officer). The Compliance Director, as a representative of the uppermost management level, is responsible for compliance and sustainability (environmental, social, ethical or human rights questions) in the Zollner Group of companies.

The Compliance Director is supported by the Corporate Compliance Team in Global Management. The Corporate Compliance Team (Global Compliance Officer) coordinates execution of the complaint process at all global Zollner locations, monitors implementation of risk management and routinely informs the Managing Board about current human rights topics and any occurrences.

The Corporate Compliance Team is supported by the following positions:

- Country Compliance Officers (assigned in each country), who are responsible for the national Zollner complaint process;
- Persons in charge of compliance, who are responsible for processing tips, complaints and other suspected cases, as well as follow-up measures.

Tips and complaints are always to be processed by the Zollner foreign subsidiary affected by the tip or complaint - under the coordination of the Country Compliance Officer.

If a process has "global significance" or is a "special case", processing is performed under the overall control of the Corporate Compliance Team.

A process has "global significance", if:

- the tip or complaint is about the supply chain;
- the tip or complaint is about the Managing Board or Managing Director in a foreign subsidiary;
- the tip or complaint is about more than one company or one country;
- the accusations could impact the entire Group of companies with loss of image such as due to nationwide reporting, for example.

We designate a process as a "special case", if:

- there are indications that no objective or independent investigation of the accusations is to be expected locally or the protection of the whistleblower against reprisals would not be guaranteed;
- the foreign subsidiary does not possess the necessary resources to clarify the issue.

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4 Fundamentals for internal investigations

The following fundamentals apply to the handling of tips and complaints as well as internal investigations:

4.1 Protection against discrimination

A person submitting a report can do that without the fear of reprisal. Nobody will be sanctioned or discriminated against due to submitting a tip or complaint. This protection also exists in cases where the tip turns out to be “unfounded”, however the whistleblower could have assumed that the tip was applicable at the time of reporting. No protection is granted whistleblowers who submit a report with ill intention.

4.2 Confidentiality & anonymity

Tips may be submitted anonymously to protect the identity of the whistleblower. Even though anonymity is possible, we encourage whistleblowers to submit their report openly, stating their name. An open report makes the investigative process more effective and helps to ensure that the reporting person is granted adequate protection and support. We cannot guarantee an investigation will be conducted if this turns out to be impossible without the knowledge of the whistleblower’s identity.

All tips and complaints are handled with confidentiality in accordance with the “need-to-know” principle. All persons involved in an investigation or the processing of complaints or tips have an obligation to maintain silence toward third parties.

Confidentiality of identity applies to:

- whistleblowers,
- people who support the whistleblower,
- people who are the subject of the report,
- other people affected by the report.

People who deliberately report recklessly incorrect information about violations enjoy no protection of their identity. Furthermore, the identity of whistleblowers can be exposed in the following cases:

- in criminal prosecution cases due to a regulatory order or legal decision,
- due to a lawful regulation,
- when forwarding is required for implementation of follow-up measures.

4.3 Data privacy protection

In the acceptance of tips and complaints, as well as further case examination and investigation, personal data is processed of the whistleblower, affected people and third parties as needed. Data privacy protection regulations are always to be considered and adhered to in doing so.

Data collection and data processing in accordance with this complaint process serves the implementation of the following statutory provisions and regulations:

- EU Whistleblower Directive 2019/1937 or the respective national implementation act of the EU Member States and the respective national legal regulations;
- § 8 the German Act on Corporate Due Diligence in Supply Chains (LkSG)
- the general legal obligations of company management and the board of the employer’s legal duty of care.

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4.4 Conflicts of interest



A conflict of interest exists when a person has or could have his or her own interests in the outcome of a process, like through a relationship with affected people or because the tip or complaint affects one's own area of responsibility.

If there is fear of conflicts of interest, the affected people cannot take part in the investigation or decisions about follow-up measures and are also not permitted to be informed about the status of the process.

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5 Sequence of the complaint process

Receipt of the report	<ul style="list-style-type: none"> Report about a violation/misconduct is recorded over a SpeakUp channel: SpeakUp® Website (https://zollner.speakup.report/violation) or SpeakUp® App
Examination of the report 	<ul style="list-style-type: none"> Global Corporate Compliance Officers (Corporate Compliance Team) examine the report for plausibility and check whether it applies as a complaint or a tip. Implausible information should be clarified, where possible, through queries to the whistleblower. Assessment of the report (plausibility check, risk assessment) is made by at least two Global Corporate Compliance Officers (possibly after consultation with the Country Compliance Officer, Managing Director or the Managing Board). It will be decided after that how the report will be further pursued. A confirmation of receipt is sent to the whistleblower within 7 days of receipt of the report by the Global Corporate Compliance Officer.
Naming a person responsible for the report	<ul style="list-style-type: none"> Transfer of the incident to the responsible Country Compliance Officer for processing (if it does not have "global significance" or is not a "special case"). If the complaint can be remedied immediately, the named person or position will initiate the necessary steps. The process can subsequently be closed.
Start: report tracking	<ul style="list-style-type: none"> The Country Compliance Officer initiates the investigation and identifies the necessary departments for the determination. Within the scope of what is legally permissible, the departments assigned with the investigation take necessary and proportionate actions from their points of view for clarification of the issue (data collection/data completion for later analysis, interviews, securing evidence).
Processing the report 	<ul style="list-style-type: none"> The Country Compliance Officer coordinates and documents report processing. The investigation is documented in the system with an interim report. The report summarizes the significant facts, provides an overview of the intermediate status of the investigations and how the examination was handled as well as the closing investigation results. Based on the report, the responsible position creates a recommendation for decision for sanctioning and any other corrective actions. Implementation of the necessary measures/action items (short-term, midterm). Examination of whether a legal assessment/statement is needed or whether the process is reported to the authorities, e.g.: through a criminal complaint (possibly release by the Managing Director, Managing Board). A status message goes out to the whistleblower from the Country Corporate Compliance Officer within 30 days of receipt of the report with the following information: <ul style="list-style-type: none"> - whether or not the complaint is confirmed and, if needed, an investigation was started; - whether and possibly why and which follow-up measures were taken or are planned.

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Report close	<ul style="list-style-type: none">▪ Feedback to the Global Corporate Compliance Officer.▪ The Global Corporate Compliance Officer checks for correct documentation of the case: the interim report, evidence collected during the investigation, which sanctions and corrective actions were imposed or taken.▪ The case is closed upon successful investigation.▪ Internal reporting (forwarding information to affected parties) is initiated, and the effectiveness examination is planned.
	
Confirmation, Lessons Learned	<ul style="list-style-type: none">▪ After the report is closed, the whistleblower receives final notification about the results of the investigation and, if needed, executed follow-up measures by the Global Corporate Compliance Officer.▪ Lessons Learned:<ul style="list-style-type: none">- Assessment/transferability of the incident/the measures/action items to other processes (general process improvement)- Relevant results are included in the annual Compliance Assessment to ensure continuous improvement.
