

## [tell-greiner.com](https://www.tell-greiner.com) policy

### Policy for Greiner whistleblower system

#### 1. Why is Greiner introducing a group-wide whistleblower system?

Greiner employees are bound by the Greiner Code of Conduct. "Employee" refers to both male and female employees and includes all persons employed by or in a similar relationship with Greiner.

The Code of Conduct requires Greiner employees to comply with all applicable laws, in particular to adhere to human rights, employment law regulations and minimum standards, competition law provisions and anti-corruption legislation, as well as other guidelines specified in this Code that must be observed when carrying out activities for Greiner. Although appropriate departments within Greiner are already in place to receive reports of infringement, the whistleblower system is designed to provide an additional opportunity for employees, customers and business partners of Greiner, who will also be made aware of and bound by the Code of Conduct, to report infringements anonymously or indirectly. The whistleblower system can be accessed online at [tell-greiner.com](https://www.tell-greiner.com).

Please help us to tackle infringements early on and, in turn, protect our company, employees, customers and business partners from financial and immaterial damage (damage to reputation, loss of business secrets and other confidential information, etc.)! We assure you that the information obtained in this way will be used in accordance with all applicable legal provisions and that we have obtained all necessary approvals for operating the whistleblower system.

#### 2. What infringements must be reported?

We would like to be notified of infringements of the Code of Conduct by Greiner employees in order to clarify and end such infringements. Therefore, we encourage our employees, customers and business partners to also notify us of such infringements or corresponding suspicions using the whistleblower system. You can do so anonymously at your discretion, but we would rather you stated your name to minimize the possibility that the system is abused. Please also note that the whistleblower system is only for reporting infringements against the Code of Conduct; for complaints or infringements of other internal company regulations, please contact the competent department within Greiner.

#### 3. Will reports be dealt with in confidence?

We guarantee that all whistleblowers will be dealt with in confidence. This also applies to information reported. Employees should primarily report infringements to their superiors; however, we understand that this is not always pleasant or appropriate. Therefore, any employee can also go straight to the General Counsel and Group Compliance Officer of Greiner in Austria ([maximilian.wellner@greiner.com](mailto:maximilian.wellner@greiner.com)), to the competent Local Compliance Officer or, if the matter

concerns the Group Compliance Officer, to the Board ([management@greiner.com](mailto:management@greiner.com)). Alternatively, you can use the whistleblower system. Even if you want to report infringements anonymously, we ask that you set up a mailbox under a pseudonym (i.e. under a false name which cannot be traced back to you) so that we can ask you any questions. Of course, your identity will also be kept confidential even if you state your name when reporting an infringement.

#### **4. Who can report an infringement?**

Infringements of the Code of Conduct can be reported by any employee, as well as customers and business partners of Greiner. As an employee of Greiner, you are therefore obliged to ensure that our customers and business partners are also aware of the Code of Conduct and the possibility of reporting infringements via the whistleblower system.

#### **5. How and where can infringements be reported?**

An infringement can only be reported online at [tell-greiner.com](http://tell-greiner.com). More information is available on this website. The whistleblower system is operated by an external service provider in Austria. The service provider is bound by Greiner to treat all information they receive through the system with confidence and to lawfully and securely store the data on the instructions of and under the supervision of Greiner.

#### **6. What happens to any reports made? How do whistleblowers learn of the outcome?**

Infringements reported using the whistleblower system are presented to the General Counsel and Group Compliance Officer of Greiner in Austria. The General Counsel and Group Compliance Officer decides independently

- whether the report is pursued;
- which departments in which companies of Greiner are called upon to deal with a possible investigation and whether external advisors are consulted for this;
- whether the employee accused of an infringement of the Code of Conduct is informed of the report and/or the launch of an investigation; and
- whether and what information the whistleblower is given as to what happens next and the outcome as a result of their report.

The latter in particular will depend on the circumstances of the individual case and of the legitimate confidentiality interests of the person accused of the infringement or other persons involved in the incident. Often, however, the information given will be limited to whether or not the report is pursued. The General Counsel and Group Compliance Officer must only involve departments in other companies within Greiner if the reported infringement concerns senior executives or its significance extends across several regions; in other words, it impacts the entire or large parts of Greiner. In all other cases, the General Counsel and Group Compliance Officer will inform the investigating body in that company

where the infringement is said to have occurred. Further information about the investigation of such reports and their outcome are given to the General Counsel and Group Compliance Officer and other companies of Greiner in an anonymous format only. As a rule, the employee accused of an infringement is confronted with the accusations made against them; they are also given the opportunity to comment. This only ceases to apply if and for as long as this information could impede further investigation.

**7. What are the consequences for an employee who has committed an infringement and for the whistleblower?**

If an employee is found guilty of an infringement as a result of a report, they may face disciplinary measures and action under employment law. This ranges from a mere warning, to a transfer, termination of employment or dismissal without notice. The whistleblower, on the other hand, faces no negative consequences as long as the infringement was reported in good faith. However, malicious, deliberately false reports can draw the same consequences as those faced by an employee found guilty of an infringement. Greiner reserves the right to assert claims for damages against such employees.

**8. How long is information concerning the infringement report and corresponding investigation stored?**

The report and information gathered in an investigation are deleted two months after the investigation has ended. If Greiner requires the information to make or defend against claims in court or to prosecute infringements, the information is however stored for the necessary (and therefore for a longer) period of time.