

Rules of Procedure

Processing of hints and
protection of whistleblowers



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Introduction

We as the Gerresheimer Group are committed to ethical and responsible business practice as well as to our human rights and environmental due diligence obligations. In doing so, we fulfill our obligations in accordance with the German Supply Chain Due Diligence Act (LkSG) as well as the German Whistleblower Protection Act (HinSchG) and the EU Whistleblower Directive.

With these rules of procedure, we would like to gain your trust as a whistleblower. To this end, we explain to you how we receive and process hints about possible misconduct. We also explain how we protect you as an honest whistleblower.

Our complaints procedure is available to all internal and external persons. You can use this procedure to report possible violations of regulations and our policies, risks for human rights or the environment, or violations of human rights or environmental obligations. We take into account our own business operations as well as the business operations of our direct and indirect suppliers and business partners that affect us.



Our focus

Possible violations of legal regulations

- Violations that may be criminal offenses, especially in the field of white-collar crime,
- Violations that may result in fines if the violated regulation is
 - the protection of life, body or health, or
 - serves to protect the rights of employees or their representative bodies
- other violations of regulations within the scope of the German Whistleblower Protection Act.

Possible violations of our internal guidelines

Risks to human rights and their violations

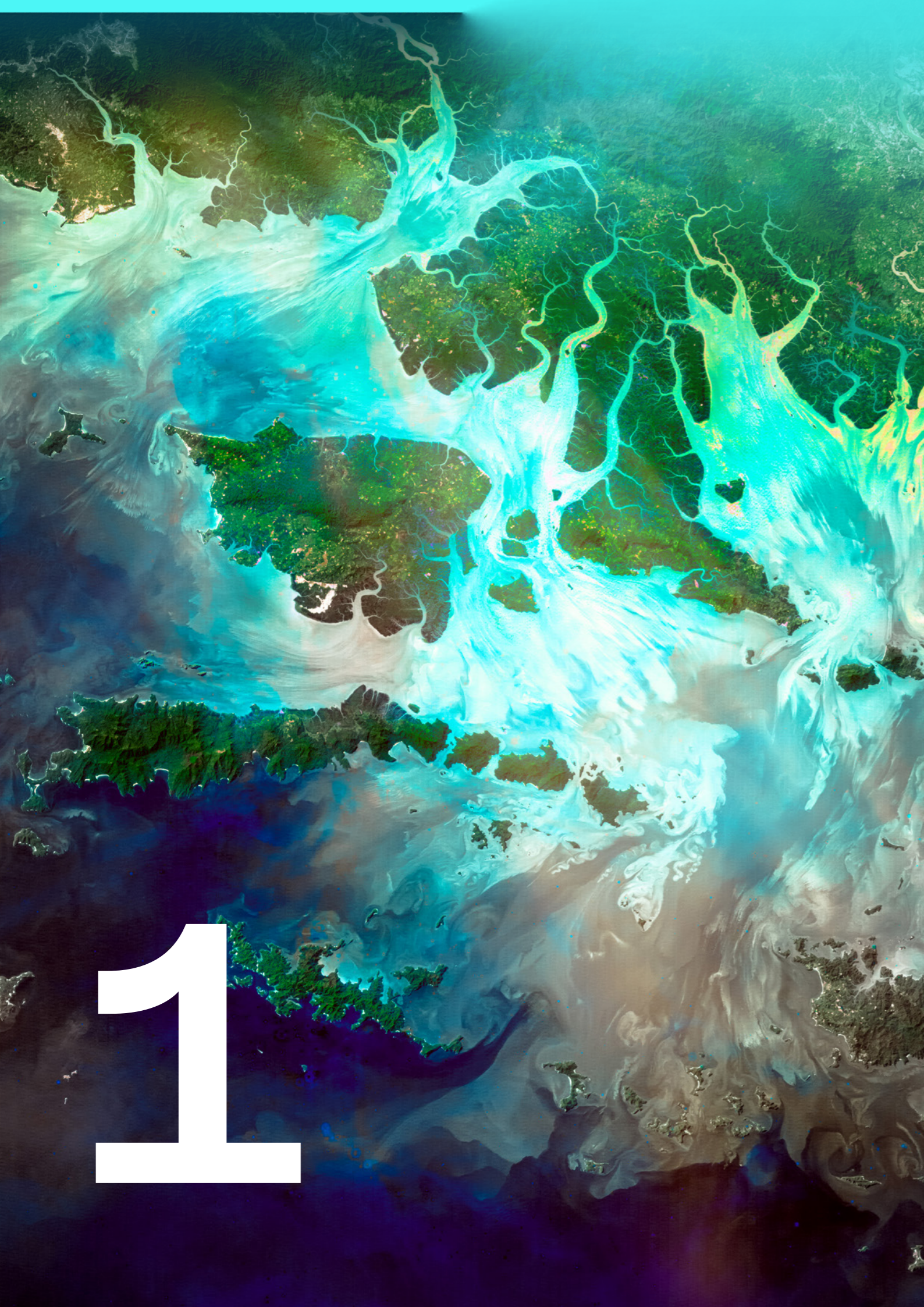
- E.G.:
- Child labor
 - Forced labor
 - All forms of slavery
 - Failure to comply with occupational safety and health requirements
 - Disregard for freedom of association
 - Unequal treatment
 - Withholding of reasonable wages
 - Unlawful eviction and land use
 - Employment of security guards who abuse force

Risks for the environment and their violation

- E.G.:
- Harmful soil alteration
 - Water and air pollution
 - Harmful noise emission
 - Excessive water consumption
 - Impairment of food safety
 - Impairment of access to drinking water
 - Impairment of sanitary facilities
 - Impairment of the health of a person

Below we explain our complaints procedure. It allows you to make complaints and provide us information concerning the topics mentioned above.

You can also engage in a dialogue with us through the process. In doing so, you will help us meet our commitment to lawful business practices as well as the protection of human rights and the environment in our business operations and supply chain.



1 Our internal hotlines: Your options for submitting hints and complaints

You have several options for contacting us with hints and complaints. In the following, we refer to information and complaints collectively as "reports". Depending on the focus of your report, the responsible department of Gerresheimer AG

will coordinate the processing of your report in cooperation with the Group Legal & Compliance department. This department may involve other departments in the process.

Focus of your message	Responsible department of Gerresheimer AG
Accounting and bookkeeping regulations	Group Accounting
Taxes and duties	Group Treasury, Tax & Global Shared Services
IT Security	Global IT
Labor and social legal protection / Conflicts of interest	Global Human Resources
Human Rights	Global Human Resources
Occupational safety, plant safety and health protection	Group EHS, CSR, OPEX
Environmental protection	Group EHS, CSR, OPEX
Antitrust and competition law	Group Legal & Compliance
Corruption	Group Legal & Compliance
Fraud, embezzlement, theft, forgery of documents	Group Legal & Compliance
Shareholder rights, securities trading, insider law	Group Legal & Compliance
Privacy	Group Legal & Compliance
Money laundering	Group Legal & Compliance
Other behavior that does not comply with the law or internal rules	Group Legal & Compliance

Our whistleblowing platform is accessible to everyone on the Internet.

1.1 Our electronic whistleblowing system

You can also submit reports to the relevant department via our electronic whistleblowing system (Business Keeper AG - BKMS).

Our whistleblowing system is accessible from any Internet-enabled device. It is available to you worldwide, around the clock, and in twelve languages. You can find the whistleblowing system here:

[BKMS system](#)

You decide in the whistleblowing system whether you want to give your name or remain anonymous. However, if your country prohibits anonymous reporting on certain topics, the whistleblowing system will exceptionally not offer you the option to report anonymously.

The system works like an electronic mailbox. Thus, in addition to the report, it also enables a confidential dialog between you and us online. You can also remain anonymous in this dialog if you set up the so-called protected mailbox in the system. You will then receive our questions and answers in this separated mailbox. To read them, you must then log into the protected mailbox. The procedure for this is explained on the start page of the BKMS system.

1.2 Message by e-mail

You can also contact the relevant department with your reports by e-mail. Please use the e-mail address below for this purpose:

compliance@gerresheimer.com

Only two employees of the Group Legal & Compliance department have direct access to the e-mails sent to this address. They check incoming messages and forward these to the relevant department.

1.3 Message by letter

You also have the option to submit reports by letter to the appropriate department. The address is:

Gerresheimer AG
Group Legal & Compliance
Klaus-Bungert-Str. 4
40468 Düsseldorf
Germany

Only employees of the Group Legal & Compliance department have direct access to reports sent to this address. They check incoming reports and forward these to the responsible department.

1.4 Telephone message

From Monday to Friday you can also contact Gerresheimer AG by telephone between 9 a.m. and 4 p.m. The telephone number is +49 211 61 81 00. You can submit reports by telephone in German and English. Callers will then be connected to the relevant department.

1.5 Personal notification at our sites

You also have the option of contacting our locations in the respective national language. The list of our locations and contact details can be found here:

[Locations worldwide - Gerresheimer AG](#)

You also have the option of submitting your report in person at the respective location. If you would like to use a meeting for this purpose, we offer this at the respective location. The respective locations are obliged to forward your report immediately to the responsible department of Gerresheimer AG.



2 Process flow

2.1 Overview

1 Receiving the message	Sending of an acknowledgement of receipt, if you allow us to do so
2 Checking the message	Review of the notification for investigative leads and draft of an investigative plan.
3 Determination of the facts	Conduct of fact-finding investigation. Discussing specific issues and situations with the whistleblower.
4 Remedy planning	Based on the facts, develop corrective actions, if necessary including a settlement agreement with the whistleblower
5 Implementation of measures	Implementation of the remedial measures
6 Implementation evaluation	Evaluation of the implemented measures, if necessary together with the whistleblower
7 Follow-up tests	Annual review of the effectiveness of the implemented remedial measures. Supplementation of measures if necessary.

We investigate the facts, evaluate them and take action.

2.2 Acknowledgement of receipt

Once we receive your notification, we will acknowledge receipt within seven days. This requires that you have provided us with a contact option.

We therefore advise to use our electronic whistleblower system with the protected mailbox function. It enables you to communicate with us even if you report anonymously.

2.3 Fact Finding

We will evaluate your report within one month and check the facts you have reported. Provided you have allowed us to contact you, we will ask you questions if necessary. This applies primarily if your report does not allow us to determine the facts (e.g., because it remains unclear where the risk or violation exists). We also regularly contact individuals you may have identified as potential contacts during the review.

Please do not regard the time given as a deadline, but as a guideline. If the facts of the case are clear and all sources of knowledge (e.g. contact persons) are known, the audit is usually completed in a few weeks. If, on the other hand, the facts are complex (e.g. if the involvement of a business partner is required) or if contact persons are unknown or unavailable, the audit will regularly take longer.

During the fact-finding phase, you may inquire about the status or provide further guidance through the designated channels (see item 1.). However, please assume that we will contact you immediately if we have any questions for you or if our review is completed.

2.4 Interim status

If the processing of the notification is not completed after three months, you will receive an interim status. In this, we will provide you with an overview of the corrective measures taken or planned, as well as a brief explanation of these measures. This feedback will not be provided if the report would affect our fact-finding or rights of individuals related to your report.

2.5 Remedial action

We will take appropriate action as it is possible when fact-finding reveals a violation of specific regulations or a risk to or violation of human rights or the environment.

This may include offering you amicable dispute resolution. The objective of our remedial action may be, depending on the individual case, to reduce or eliminate risks or to eliminate a breach or violation.

Depending on the complexity, the implementation of the measures can take several weeks up to one year. In individual cases, implementation may also take longer.

During the implementation phase, we report to you regularly on the current status, as far as you allow us to do so. On average, we report once per quarter. At the end of the implementation phase, you will receive a final report.

2.6 Measure evaluation

In the period following the final notification, we evaluate the implemented measures with regard to their specific objective. If the goal has not been achieved, we take appropriate further measures according to our possibilities.

The measure evaluation takes place regularly within one year after the completion of the measures. If you have enabled us to do so, we will also contact you for the measure evaluation (e.g. to review measures to protect you from disadvantages).





3 Procedural principles

We apply the following procedural principles in our whistleblowing report processing and whistleblower protection procedures.

3.1 Confidentiality

We treat the identity of the reporting person and the persons named in the report as confidential. We disclose the identity of the persons, insofar as it is known to us, only to employees and service providers who receive the report, process it and are responsible for follow-up measures. However, this disclosure is only made to the extent that it is necessary for the performance of the specific task.

Otherwise, we disclose the identity according to the standard of necessity to persons and authorities insofar as we are legally obligated to do so (e.g. law enforcement agencies, other authorities, courts) or are entitled to do so (e.g. because you have consented that is necessary for follow-up measures or our legal defense).

3.2 Protection of the reporting person

We take very seriously our duty to protect whistleblowers, to conduct business ethically and lawfully, and to exercise due diligence in respecting human rights and protecting the environment. Individuals who alert us to violations of regulations or risks or violations in the above areas make a valuable contribution to meeting our own standards.

Therefore, persons who report violations of relevant regulations or risks or violations of human rights and the environment to us do not have to fear any disadvantages from us. This also applies in principle if the reported suspicion is not confirmed during the investigation.

Only if the reporting person gives deliberately or grossly negligently untrue information at the time of the report, the protection does not apply. In this case, we reserve the right to take legal action including a claim for damages and criminal charges (e.g. for false suspicion).

3.3 Protection of our employees

We protect our employees from false accusations. If our employees are accused of violating relevant regulations or human rights or protecting the environment, the presumption of innocence applies until proven otherwise.

If our employees report the relevant violations of relevant regulations or risks or violations, the protection under Section 3.2 applies to them.



We treat the identities of all participants as confidential.

3.4 Impartial, confidential and open-ended processing

We commission employees and service providers (e.g., auditing firms, experts, attorneys) to receive, process and review reports. They are independent with regard to their specific tasks and are not subject to instructions. Their mandate is an open-ended investigation of the facts. They are bound to secrecy.

We select the employees and service providers we commission with fact-finding and evaluation in the event of reports according to their competence. We regularly train our employees on their tasks.

3.5 Documentation

We document incoming reports and the main procedural steps (e.g. investigation, remedial measures) in a report directory. We generally delete or anonymize the personal data in this directory as well as any supplementary documentation two years after the completion of the procedure. Exceptions apply, for example, if we need the data to defend our rights or for official or judicial proceedings.

3.6 Privacy

Our procedure for processing hints and whistleblower protection is an offer to you. You are free to use it.

The legal basis for our procedure is Sections 8 and 9 of the German Supply Chain Due Diligence Act (LkSG) and – depending on the country – the laws for the protection of whistleblowers.

When our complaints procedure is used, we also store and process personal data (e.g. names and contact addresses insofar as these are provided) in accordance with the applicable data protection laws. The personal data concerns persons who report and, where applicable, also persons who are mentioned in reports. In addition, we store personal data of our employees as well as of service providers who process the reports or remedial actions.

We share the notification and personal data exclusively with recipients who are involved in the fact-finding and evaluation as well as the measures and their assessment. This may also involve the selective transfer of data to subsidiaries or external service providers and, in exceptional cases, to authorities and courts. We proceed strictly according to necessity. We oblige the recipients to maintain confidentiality.

For further information on how we handle personal data, please refer to our data protection notices. You can find them here:

<https://www.gerresheimer.com/en/data-protection>



Contact information

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This standard is available in various language versions; in case of deviations or ambiguities, the English version shall prevail.

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