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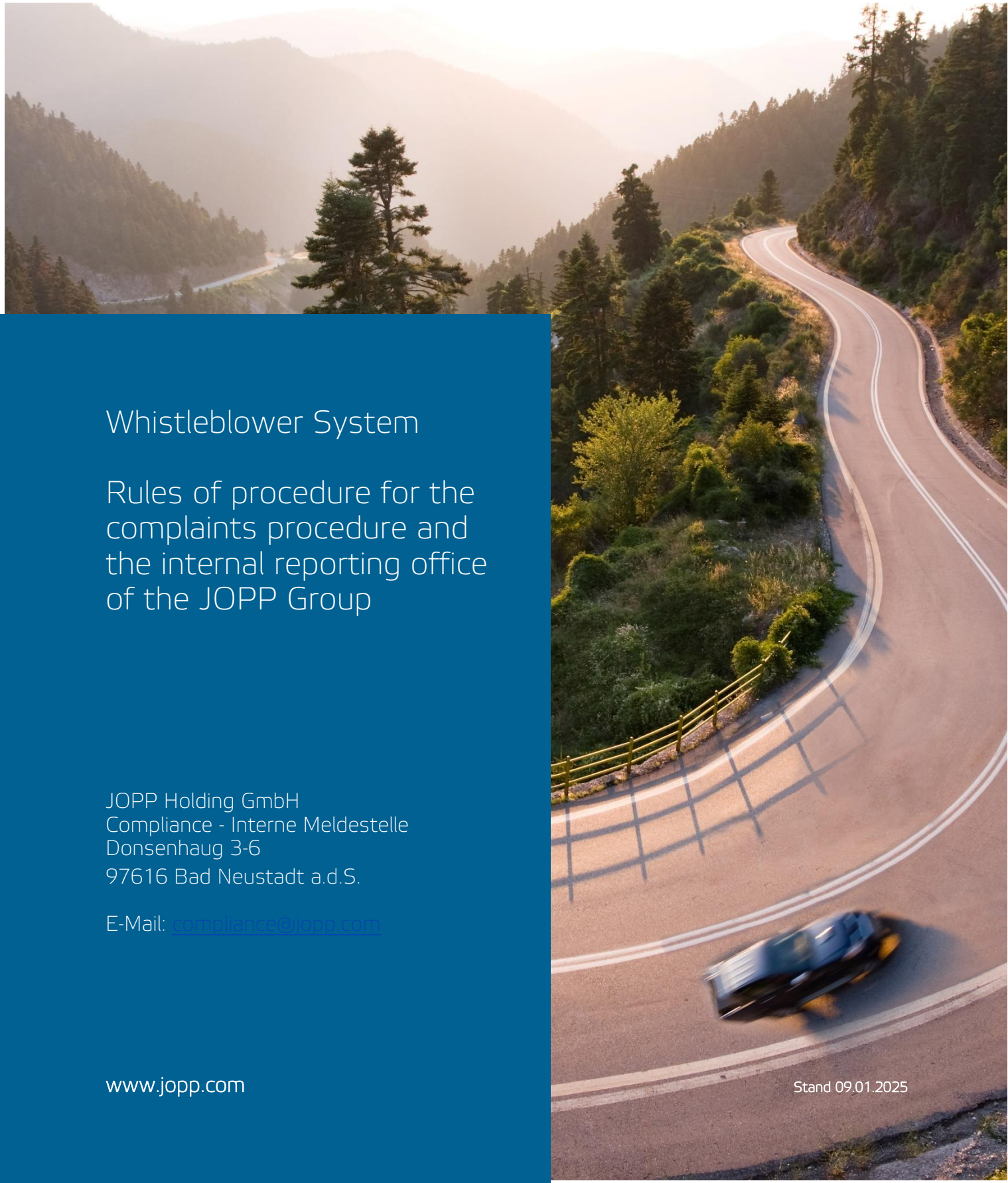

Whistleblower System

Rules of procedure for the complaints procedure and the internal reporting office of the JOPP Group

JOPP Holding GmbH
Compliance - Interne Meldestelle
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Stand 09.01.2025

Whistleblower System

JOPP has a whistleblower system with various reporting channels that gives employees, business partners and other third parties the opportunity to submit information and complaints about actual or suspected violations of legal regulations and/or compliance rules to JOPP.

Complaints about human rights or environmental risks and any violations of the relevant due diligence obligations in accordance with the German Supply Chain Due Diligence Act (LkSG) can also be reported.

JOPP's rules of procedure explain the reporting channels, the procedure, responsibilities and confidentiality.

The following contact options are available for submitting relevant information and complaints:

E-Mail: compliance@jopp.com

Letter:
Personal/Confidential
JOPP Holding GmbH
Compliance - Interne Meldestelle
Donsenhaug 3-6
20457 Hamburg

Phone: +49 9771 9105 - 0

Whistleblowers can also submit their report completely anonymously if they wish.

Rules of procedure HinSchG and LkSG

Rules of procedure on the handling of notices under the German Notice Protection Act (HinSchG) and the German Supply Chain Due Dilligence Act (LkSG))

I. Objective and scope of application

As an internationally operating family business in the automotive supply industry, JOPP sees compliance with the relevant laws and internal guidelines as well as environmental standards and respect for human rights as a fundamental principle of its corporate and sustainable actions. JOPP also expects its business partners to act in a legally compliant and sustainable manner in their respective business areas and in their co-operation with their business partners and subcontractors.

Transparency is essential for JOPP in order to recognise violations of legal regulations and internal guidelines as well as human rights and environmental risks and violations as early as possible. This knowledge enables effective remedial and preventive measures to be taken and damage to be prevented or minimised.

Internal and external persons, in particular employees of JOPP as well as business partners and other stakeholders, have the opportunity to report actual or suspected violations of legal regulations and internal guidelines as well as human rights and environmental risks and violations that have arisen as a result of actions in their own business area or those of a direct supplier. To this end, JOPP has a whistleblowing system with various reporting channels for the transmission of relevant information and complaints.

These rules of procedure for the whistleblower system under the German Whistleblower Protection Act (HinSchG) and for the complaints procedure under the German Supply Chain Due Diligence Act (LkSG) explain the reporting channels, the procedure, responsibilities and whistleblower protection.

II. Reporting-/ complaint channels

The following channels can be used to submit information and complaints:

E-Mail: compliance@jopp.com

Letter:
Personal/Confidential
JOPP Holding GmbH
Compliance - Interne Meldestelle
Donsenhaug 3-6
20457 Hamburg

Phone: +49 9771 9105 – 0

Whistleblowers can also submit their report completely anonymously if they wish.

III. Procedural principles and course of the notification/complaint procedure

Incoming reports are processed in accordance with the process defined below. The Compliance department is responsible for processing incoming reports and complaints. The employees dealing with the reports have been obliged and authorised by the management to carry out their work independently, impartially and without being bound by instructions in accordance with the principles of confidentiality and diligence. They are bound to secrecy.

1. **Receipt of the report and confirmation of receipt**
   The reporting person will receive confirmation of receipt of the report within 7 (seven) days, if and insofar as there is a possibility of contacting the reporting person.

2. **Initial check**
   At the beginning of the procedure, it is checked whether the reported facts fall within the material scope of the Whistleblower Protection Act or the Supply Chain Due Diligence Act. If this is not the case or if the report is not processed via the whistleblower system, the procedure ends.

3. **Clarification and investigation of the facts**
   Be In the event of justified and comprehensible indications of a violation of legal regulations and/or internal guidelines or violations of human rights and

environmental obligations or indications of human rights or environmental risks, the necessary measures are taken.

An internal investigation is initiated with the aim of determining whether an offence and/or risks exist. As part of the investigation, the facts of the case are investigated further and, if necessary, the content of the report is discussed with the person providing the information in order to gain a better understanding of the facts. If necessary, contacting the persons concerned is also part of the internal investigation. Depending on the content of the respective report, it may be necessary to involve experts from other departments (e.g. Human Resources, Data Protection, Purchasing or Sustainability) in the investigation. In particular with regard to violations of human rights and environmental obligations under the Supply Chain Due Diligence Act, the relevant specialist department will take the lead in examining and developing a solution. The investigation will be carried out as quickly as possible and without major interruptions while respecting confidentiality, data protection and the protection of the identity of the whistleblower.

4. Communication with the whistleblower
   After confirmation of receipt, the whistleblower will be contacted if necessary and as far as possible in order to obtain further information and discuss the facts of the case. The whistleblower can obtain information on the status of the procedure at any time during the procedure. They will receive feedback on the follow-up measures within 3 (three) months of confirmation of receipt, if possible in the individual case, otherwise after 6 (six) months, in accordance with Section 6 below.

5. Remedial measures
   If and to the extent that the internal investigation reveals a violation of legal regulations and/or internal guidelines of JOPP or human rights and/or environmental risks or violations in its own business area or at suppliers, effective and appropriate remedial measures will be taken to end or minimise the extent of the violation, risk or infringement.

   Remedial measures may include, in particular, steps under labour law, civil law or criminal law. In the event of violations by business partners, appropriate measures may include additional controls and audits as well as the temporary or permanent termination of the business relationship.

   The findings from the procedure are also used to review existing work and compliance processes and, if necessary, to adapt and optimise them and, if

necessary, to implement further preventive measures.

6. Conclusion of the procedure
   The investigation of the report can be terminated for various reasons:
   1. the report or complaint does not fall within the material scope of the Whistleblower Protection Act or the Supply Chain Due Diligence Act,
   2. violations of legal regulations and/or internal guidelines as well as human rights or environmental risks and violations of human rights and environmental obligations were
      a) not confirmed or
      b) remedied by the corrective actions taken.

IV. Confidentiality and protection against discrimination and punishment

The protection of the whistleblower is of great importance to JOPP. Whistleblowers who report actual or suspected misconduct in good faith need not fear any disadvantage or punishment as a result of their report. The following measures, among others, serve to protect whistleblowers:

Reports and complaints are only processed by a small group of trained JOPP Group employees. The identity of the person providing the information is treated confidentially and their personal data is protected in accordance with data protection regulations.

JOPP does not tolerate discrimination, intimidation of whistleblowers or reprisals against them. Such behaviour itself constitutes a potential compliance violation and will be dealt with accordingly.

Intentionally or grossly negligent incorrect information that is reported and information that is provided with improper intent is not covered by whistleblower protection.

V. Review of the effectiveness of the complaints procedure and the rules of procedure

The effectiveness of the complaints procedure and these rules of procedure will be reviewed annually and on an ad hoc basis. If necessary, the complaints procedure and the rules of procedure will be adapted.

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Impressum

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