



Elmos ESG Policies

Section:	Governance
Chapter:	Compliance
Policy:	Whistleblower system
Coverage:	Elmos Group
Supported UN SDGs:	



Addressed GRI Standards:	2-25, 2-26, 205
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Compliance with applicable laws and statutes and with all internal rules and regulations is a top priority for Elmos. We pursue a strict zero tolerance policy in relation to compliance violations and have a Group-wide compliance management system (CMS) in place. One key element of our CMS is the provision of a whistleblower system with various reporting channels, including full anonymity when desired. The whistleblower system offers all our employees as well as our business partners, suppliers, and customers a way to report violations, e.g. in terms of the law, our code of conduct, or our policies. Elmos explicitly encourages this kind of reporting. Possible topics include violations of competition law, corruption, conflicts of interest, misuse of company property, information security, data breaches, discrimination, human rights violations, and breaches of occupational health and safety or environmental protection. Whistleblowers can submit reports for example via regular mail, e-mail, or a web-based whistleblower portal. The relevant contact details are available on the Elmos website. The portal can be reached using the link provided (<https://elmos.whistleblower-system.de/>). It is available in German and English. The Elmos whistleblower system meets the requirements of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG) and the Whistleblower-Directive of the European Union (EU 2019/1937) on the protection of persons who report breaches of Union law. It is also compliant with the EU General Data Protection Regulation (GDPR).

The steps required to report a violation via the portal are simple and intuitively designed to make using the portal as easy as possible. Accessible reports can be made by voice recording.

Elmos has pledged to treat all incoming reports as confidential, to investigate them conscientiously and to initiate the necessary actions. After the report is sent, it is reviewed by the Chief Compliance Officer and compliance committee. To clarify any follow-up questions that may arise, the compliance committee can contact the whistleblower, including a completely anonymous way, via a return communication channel in the course of the process. Whistleblowers receive feedback on their report as soon as possible, and in any event within three months. If necessary, they are also notified of any follow-up measures that are planned or have already been taken and the reasons for these actions (such as internal research or inquiries).

Elmos views confidentiality and integrity as top priorities. No one who reports a suspected compliance violation in good faith should fear any adverse consequences or reprisals, even if the report of the suspected breach turns out to be unfounded. We do not tolerate any form of retaliation against whistleblowers and are determined to protect them.

ESG policies	Anti-discrimination
	Business ethics and anti-corruption
	Compliance management system (CMS)
Accompanying documents	Anti-Corruption Policy
	Code of Conduct for Employees
	Code of Conduct for Suppliers and Business Partners