

WHISTLEBLOWER-PROCEDURE

The subject of whistleblowing has a special place in the compliance efforts of PROLICHT. In our Code of Ethics, we commit ourselves to upholding our values and complying with applicable national and international law. Whistleblowing provides an opportunity to report the breach in the company if stakeholders violate this Code of Ethics or applicable law. As a company with fewer than 249 employees, there is currently no urgent need for implementation. According to the EU directive, the transposition deadline for setting up an internal reporting channel expires on 17.12.2023. Nevertheless, we have decided to give our employees the opportunity to report grievances in the company.

WHISTLEBLOWING

By defining the whistleblower procedure, employees are encouraged to report problems regarding business ethics in the company. These include, for example, corruption, problems in dealing with environmental protection or product safety. Whistleblowers are also protected by applicable EU law (Art. 19 RL EU 2019/1937) against personal harm or reprisals by submitting a report. This whistleblower procedure is based on the EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law and the draft Federal Act on the Procedure and Protection in the Event of Reports of Breaches of the Law in Certain Areas of Law (Whistleblowing Act - WbG).

WHISTLEBLOWER DEFINITION

A whistleblower is usually someone who expresses a suspicion of misconduct in a company. According to EU law, employees, former employees, trainees, self-employed persons, employees of suppliers and business partners working with PROLICHT are protected by the directive. In addition, third parties who are closely related to the whistleblower (e.g. family members) are particularly protected.

PROTECTION OF WHISTLEBLOWERS

PROLICHT is obliged to observe the obligation of confidentiality with regard to the reports. The identity of the person giving the information shall not be disclosed to anyone other than the authorised persons without their express consent. Whistleblowers are also protected by applicable EU law (Chapter 6 of the RL EU 2019/1937) against civil, criminal or administrative liability on the basis of the report. In addition, labour law consequences and reprisals are prohibited.

WHISTLEBLOWER PROCESS FOR PROLICHT

Based on the above-mentioned EU Directive (Art. 9 RL EU 2019/1937) PROLICHT provides the following procedure for dealing with whistleblowers:

- Receipt of a message via the reporting system.
- Documentation of the message.
- Confirmation of receipt of the report to the whistleblower within seven days.
- Designate an impartial person or department responsible for the follow-up of the report.
- Processing of the report (internal investigations or investigations)
- The whistleblower will be fully informed about the Follow-up information.

AREAS OF APPLICATION

The following violations of national and Union law fall within the scope of the directive according to the EU Directive (Art. 1 (1) RL EU 2019/1937):

- Preventing, preventing and combating criminal offences in the field of corruption.
- Public procurement
- financial services, financial products and markets and the prevention of money laundering; and Financing of terrorism
- Product safety and conformity
- Road safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data and security of network and information systems

It should be noted that personal grievances such as bullying or harassment do not fall within the scope of the Whistleblowing Directive. This is explicitly communicated to the employees in the intranet. Here you will also find information on which complaint procedure is effective in such a case.

IMPLEMENTATION OF THE INTERNAL REPORTING CHANNEL

The reporting channel is implemented with the help of the whistleblower solution “Trusty”. The tool consists of a front-end through which employees can make reports, as required by the EU Directive (Art. 5 para. 2a RL EU 2019/1937) in written form, GDPR-compliant and optionally anonymously. Furthermore, it is available in the backend, which serves the case management and the documentation of the messages. Only authorized employees have access to this information in order to ensure the confidentiality of the reports.

The link to the reporting channel is published in the intranet and is thus available to all employees at any time, regardless of language within the company network. In addition, employees are informed on the intranet about the reporting channel and the whistleblower procedure.

JURISDICTION

Only Mrs. Mag. (FH) Eva - Maria Deng (HR-Management) is authorized to access the reports and the case management. Details and information on the whistleblower procedure at PROLICHT can be requested from the “Human Resource” team.

IMPLEMENTATION GUIDE

Whistleblowing

What is whistleblowing?

Whistleblowing is the reporting of grievances and incidents within a company. You have the possibility, for example, to report information about corruption, fraud or other illegal activities within the company via our secure channel (see box below). We are grateful for every report!

What breaches can be reported?

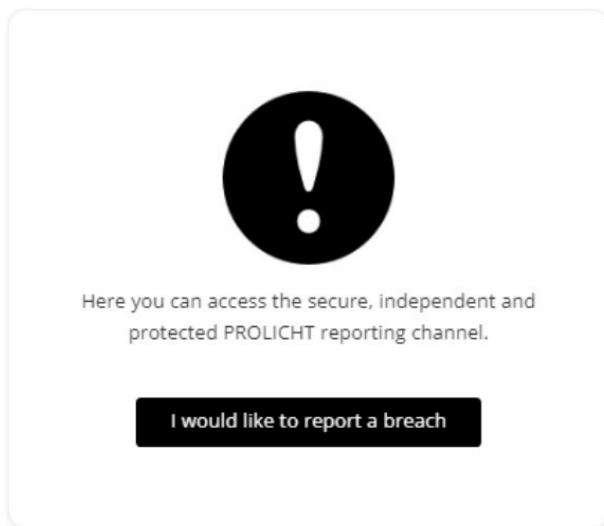
The following violations of national and Union law fall within the scope whistleblowing:

- Preventing, preventing and combating criminal acts in the field of corruption
- Public procurement
- Financial services, financial products and financial markets, and prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health • Consumer protection
- Protection of privacy and personal data and security of network and information systems

CAUTION! Personal grievances such as bullying or harassment do not fall within the scope of the whistleblowing procedure (See below).

Want to learn more about whistleblowing or unsure if you should report an incident? Then check out the "[Whistleblowing FAQs](#)" section below.

(Introduction to whistleblowing)



(Link to the Internet reporting channel)

FAQs on whistleblowing

Can I remain anonymous? 

What violations can be reported? 

I feel harassed or bullied, can I also report these incidents via the platform? 

How do I create a report? 

How can I access my mailbox? 

What is the further procedure after a report? 

Who has access to my message? 

Should I expect legal problems after reporting? 

(FAQs about whistleblowing)



[EN](#) [DE](#)

Welcome to Trusty, the secure and protected internal reporting channel of Prolicht GmbH (hereinafter: the organization) for communicating information on suspected breaches within the organization.

The usage of this web application is confidential and you are not required to disclose your identity, should you wish to remain anonymous. For details on procedures regarding internal reporting and follow-up please refer to the organization's policies and the applicable national law.

[Make a report](#)

[Your inbox](#)

The report should be made in good faith. Please note, mandatory questions are marked with an asterisk (*) and you will not be able to proceed without filling in the respective fields. After submitting the report, your username and password will be automatically generated and displayed on your screen. Please write them down as you will need them to enter your inbox and follow up on your report.

Here you can follow the status of your report, including confirmation of its receipt, continue secure communication with and receive feedback from the organization.

[FAQ](#)

(International reporting channel)