

Whistleblower System

Compliance with laws, rules and internal regulations is a key priority for our company. Violations of rules and standards can result in serious damage to our company, our employees, business partners and the public. Misconduct must therefore be identified at an early stage, dealt with and remedied without delay.

This requires the attention and willingness of employees, business partners and other stakeholders to point out possible serious violations of rules in the event of concrete indications. Information can be submitted to the whistleblower system at any time in German and English.

The whistleblower system ensures the greatest possible protection for whistleblowers and those affected. An investigation is only initiated after careful examination of the report and if there are concrete indications of a severe violation of the rules. Investigations are conducted with the highest confidentiality. Information is handled through a fair, expeditious and confidential process.

1. What are examples of grievances and violations?

- Corruption, taking advantage, etc.
- Fraud
- Discrimination, sexual harassment, bullying, etc.
- Theft
- Violation of safety regulations
- Violation of environmental protection
- Money laundering

2. How to submit a report?

Reports must be as specific as possible to ensure appropriate handling and investigation. Only reports that are concrete in terms of the type of violation, severity, timing and persons involved generate sufficient initial suspicion and can be investigated.

In most cases these five questions should be answered:

- who?
- what?
- when?
- how?
- where?

There are anonymous options available as well as naming yourself. We have created the following options for you:

2.1. Making a report by email: compliance.bucher@kanzlei-zimmermann.net

To guarantee maximum protection of the whistleblower we have implemented an external ombudsman. As a lawyer, he is bound to secrecy and will only transmit content without any clue to the identity of the whistleblower to our compliance officer.

This email address is set up exclusively for this purpose. It will only reach the lawyer personally. If you nevertheless wish to remain anonymous to him as well, it may be advisable to set up an "anonymized e-mail account" with a free provider for this purpose. Compared to letter mail, this variant offers the advantage that queries to the whistleblower are possible.

2.2. Letter mail

As a further option, you can of course also contact the ombudsman by letter mail. Please write to:

Kanzlei Zimmermann
Attn. Whistleblower Management System Bucher
Nornheimer Straße 10a
89312 Günzburg
Germany

3. Who receives my report?

When a report is received by email, the external ombudsman extracts the contents and forwards them anonymously to selected compliance departments at Bucher. Letter mail will be handled in the same way.

4. What happens to my report?

First, the compliance officer assesses whether there are sufficient indications of a severe violation of the rules. If there is a sufficient initial suspicion, a defined process is triggered and investigations are initiated.

If there is an actual violation of the rules, the causes are determined and, if necessary, measures are initiated.

To ensure a clean evaluation and investigation, it is important that your information is as comprehensive, clearly understandable and concrete as possible.

If your reporting method allows it, you will receive feedback on the status or the result, taking into account data protection and the tactical aspects of the investigation.

5. What is the whistleblower system not intended for?

The system is designed to identify violations and to remedy them in the interest of all concerned and where necessary to punish violations. It is not intended to discredit others without concrete evidence.

With this system, we hope to motivate employees and external knowledge holders and give them the opportunity to constructively contribute to the compliance of our company within a safe framework without having to fear personal consequences and negative repercussions.



Stefan Bucher on behalf of the company

Version 01, March 10, 2021