

INFORMATION ON THE USE OF THE REPORTING PROCEDURE AT PROGROUPE AG AND ITS AFFILIATED UNDERTAKINGS ("PROGROUPE GROUP")

1. IN WHICH CASES CAN OUR WHISTLEBLOWING SYSTEM BE USED?

This policy applies within the Progroup Group to all reports of possible breaches of the Compliance Code and breaches of the law.

2. HOW CAN REPORTS BE SUBMITTED?

In order to follow up on reports of violations in a fair and appropriate manner, we have mainly set up an electronic reporting channel.

This gives employees of the Progroup Group and external parties the opportunity to get in touch with the Legal, Insurance and Compliance department via an internet-based communication platform, to exchange documents and to stay in touch via a dedicated mailbox. All this works in a confidential and secure manner. Reporting persons can decide for themselves whether they wish to submit a report by name or remain anonymous.

You can access the electronic reporting channel via the following link:
<https://progroup.integrityline.org/>

Reports can be submitted around the clock in German, English, French, Italian, Polish, Czech and Hungarian.

In addition, you can also contact the responsible Legal, Insurance and Compliance Department by e-mail (compliance@progroup.ag), by post (Progroup AG, Legal, Insurance and Compliance Department, Horstring 12, 76829 Landau in der Pfalz) or in person by prior arrangement. All reporting channels, excluding the use of the postal reporting channel, which incurs postage, are free of charge. In addition, information on external reporting procedures is provided.

The affiliated undertakings have entrusted Progroup AG with the tasks of a reporting office. The respective company to which the reporting person submits the report remains responsible for putting an end to any infringement.

3. HOW DOES THE PROCEDURE WORK?

We treat every report, regardless of the way it is transmitted, as confidential. In the case of an anonymous report via the electronic reporting channel, there is no possibility of determining your identity.

- a) You will receive an acknowledgement of receipt within seven days of receipt of the report.
- b) The report will then be examined. Any necessary queries are clarified with the reporting person. Further action will be taken depending on the content of the report. If and to the extent necessary, the report will be forwarded to an internal and/or external contact person in accordance with the "need to know" principle and legal requirements.
- c) The processing time depends on the respective case. The reporting person will be informed of the status of the procedure to the extent possible. Feedback will be provided no later than 3 months after receipt of the report.

4. HOW IS THE PERSON SUBMITTING THE REPORT PROTECTED?

Reprisals of any form against reporting persons who submit a report in good faith will not be tolerated. Such a report has no effect on employment or career prospects for the person submitting the report.

PRIVACY NOTICE

Progroup AG has established several reporting channels for itself and its affiliated undertakings, including a so-called whistleblower system (EQS Integrity Line), in order to enable employees and external parties to report the above-mentioned breaches. In this way, the detection and prevention of breaches of the law is to be intensified and compliance is to be promoted.

When using the reporting channels, it is inevitable that your personal data are processed. The so-called General Data Protection Regulation (GDPR) now contains some specifications on how to deal with this data and in which manner we have to inform you in the process. Already at the time of data collection, you have the right to be informed about certain aspects in accordance with Art. 13 GDPR. This is why you are receiving this information.

1. CONTROLLER AND DATA PROTECTION OFFICER

The company of the Progroup Group to which the content of the report relates is the controller regarding the processing of personal data. The contact details of the companies can be found at www.progroup.ag/datenschutzerklaerung. You can reach the company data protection officer at: datenschutz@progroup.ag

The technical implementation of the electronic reporting channel of the EQS Integrity Line is carried out on our behalf by EQS Group AG, Karlstraße 47, 80333 Munich, Germany ("EQS"). This company acts on our behalf as a so-called processor within the meaning of Art. 28 GDPR.

2. PURPOSES, LEGAL BASIS AND PROVISION OF YOUR DATA

The reporting channels allow you to contact us and report possible indications of compliance breaches and breaches of the law.

It is possible to voluntarily provide information about your identity. In this case, you consent to the processing of such personal data. If you choose to disclose your identity when reporting, your first and last name will be documented along with the facts reported. You may also voluntarily provide information about your position, e-mail address, country of residence and telephone number. You can also upload documents or files. In addition, it is possible that further personal data concerning you (e.g. department, presence on the company premises on a certain day) may already result from the (reported) facts. Please note that, depending on the specific facts of the case, it may be possible to draw conclusions about your identity even without linking your name (because, for example, the person you are accusing knows that only you have knowledge of certain circumstances).

We process the (personal) data provided to document the report, to check the plausibility of the report and to take follow-up action. Consequently, the overriding purpose of data processing is the clarification and elimination of unlawful conditions and conduct within the company.

If you report a matter without providing your name, your personal data will generally not be processed (in this case, it is usually not possible to establish a personal reference). However, the information you provide will be checked and may be used to clarify the facts described.

In addition, the EQS Integrity Line includes an option for anonymous communication via an encrypted connection. When you use this connection, your IP address and your current location are not stored at any time. After submitting a report, you will receive access data to the EQS Integrity Line so that you can continue to communicate with us in a protected manner.

The processing of personal data in the context of the use of the reporting channels is based on Art. 6(1) point c) GDPR in conjunction with § 10 German Whistleblower Protection Act (*Hinweisgeberschutzgesetz – HinSchG*) / Art. 17 EU Directive 2019/1937. We are legally obliged to set up an office for reporting persons (so-called reporting office) and authorised to process personal data to the extent this is necessary to fulfil our statutory tasks. The permissibility of processing may also be based on Art. 6(1) point a)

GDPR in conjunction with § 9(3) HinSchG / Art. 16(1) EU Directive 2019/1937. This is the case, in particular, if you give your consent to the disclosure of your identity to additional persons when reporting.

In individual cases, it is possible that your identity may be disclosed to other persons or the accused also without your consent (e.g. if you have to appear as a witness in criminal proceedings). Irrespective of this, you can agree to the disclosure of your identity (e.g. to the accused employee) in advance in order to enable necessary follow-up measures to be taken. In this case, the admissibility is based on Art. 6(1) point a) GDPR in conjunction with § 9(3) HinSchG / Art. 16(1) Directive 2019/1937 (consent). You may revoke your consent at any time with effect as from that point in time. However, this will not affect the lawfulness of the processing carried out up to that point.

3. RECIPIENT

Inspection of the stored data in the reporting channels is only possible by the Legal, Insurance and Compliance Department ("Reporting Office"). Furthermore, the Reporting Office will handle the personal data as stated in the information on the use of the reporting procedure (see above).

If the report you provide relates to criminal conduct, your personal data may be disclosed to competent bodies in criminal proceedings at the request of the law enforcement authorities or pursuant to an order in administrative proceedings or a court decision.

4. STORAGE OF YOUR DATA

We only store personal data for as long as is necessary to process your report or as required by law. The documentation and your personal data are usually deleted three years after the conclusion of the procedure. To the extent this is necessary and proportionate for the fulfilment of statutory requirements, there is the possibility of longer storage.

5. DATA SUBJECTS' RIGHTS

You have the following rights:

You have the right to information (Art. 15 GDPR), correction (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) as well as data transfer (Art. 20 GDPR). We make every effort to process enquiries quickly.

6. REVOCABILITY OF CONSENT

Any consent given for the processing of personal data can be revoked at any time. The lawfulness of the processing based on the consent until revocation remains unaffected.

7. QUESTIONS OR COMPLAINTS

You have the right to contact a supervisory authority (Art. 77 GDPR).