



# Whistleblower Policy

one step ahead in **INTELLIGENT** production systems

# WHISTLEBLOWER POLICY



for employees of the FFT Group

**Dear Colleagues,**

At FFT, we are committed to integrity and an open culture where everyone feels safe seeking advice or raising concerns and can trust that reports will be handled professionally and transparently.

In this policy, "whistleblowing" means reporting suspected misconduct, illegal acts or omissions in our business by FFT employees or third parties.

The purpose of this policy is to inform FFT employees and others who become aware of specific indications of a violation of rules or other illegal conduct in connection with FFT's official activities or internal operations about how to report such indications. In addition, the policy describes how to handle tips at FFT and the associated processes.

Being informed of misconduct in a timely manner is the only way for us as a company to have the opportunity to take countermeasures and take the necessary steps to help prevent damage. This also includes preventing damage to our reputation that could result from the initiation of investigative actions by the responsible authorities. This must be prevented.

A blue ink signature of Tristan Pfurr, written in a cursive style.

Tristan Pfurr  
CEO

A blue ink signature of Hagen Dickert, written in a cursive style.

Hagen Dickert  
CFO

A blue ink signature of Volker Stark, written in a cursive style.

Volker Stark  
COO

Throughout this document, the generic masculine gender is used for ease of reading. Feminine and other gender identities are explicitly included where necessary for the statement.

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## 1. Introduction

### 1.1 Scope

This policy applies to FFT GmbH & Co. KGaA, FFT Produktionssysteme GmbH & Co. KG as well as all their subsidiaries, including majority shareholdings in companies in which a company of the FFT Group exercises management control (hereinafter collectively referred to as "FFT" or "FFT Group"). It therefore applies to all employees of these legal entities, regardless of their position, function or level of employment, as well as to all members of the corporate bodies of these entities.

The FFT Whistleblower System is not only available to FFT employees worldwide, but can also be used by business partners, shareholders and other stakeholders to report violations.

The Legal & Compliance Department may make changes to this FFT Policy as necessary to meet local requirements.

### 1.2 Objective scope of application

The purpose of the whistleblower system is to reveal possible misconduct within FFT as early as possible. This includes violations of internal FFT guidelines as well as violations of applicable legal standards in any form. In particular, violations of our Code of Conduct and the compliance rules and values of the FFT Group laid down therein will not be tolerated and are therefore likely to give rise to a corresponding report.

The organizational units and central departments existing at FFT are responsible for other topics that do not concern the conduct of employees at FFT in compliance with the rules, such as topics relating to contract law, human resources issues or quality management; the whistleblower system is not intended for these topics.

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## 1.3 Purpose of this Policy

This policy serves to provide information on the various reporting channels at FFT and their use by authorized whistleblowers. It also describes the individual steps of the reporting process, including the internal process for handling tips, from the initial receipt of a message, to informing and protecting the whistleblower, to taking action and closing the case.

FFT has set up a whistleblower system that allows tips to be submitted to an internal whistleblower office or to an external ombudsman office, which complies with data protection requirements as well as the legal requirements for corporate whistleblower systems. This FFT whistleblower system allows both FFT employees and third parties to report misconduct at any time.

This policy ensures that whistleblowers who, in good faith and out of a sense of responsibility, wish to draw attention to misconduct or wrongdoing within FFT will not be discriminated against in any way. This policy is designed not only to detect and prevent improper conduct, but also to protect whistleblowers.

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## 2. Reporting procedure

### 2.1 Motivation, reason for a notification

FFT is one of the world's leading independent suppliers of flexible production technology to the international automotive and other industries, and is committed to meeting the environmental and social challenges of tomorrow. We are aware of the responsibility that this entails, and we always examine the consequences of our decisions and actions. We are committed to minimizing the negative impact of our products and services on health, safety and the environment. This can only be achieved if we all adhere to the FFT Group Standards of Conduct. Violations of applicable laws or our Code of Conduct weaken the trust we have built with our customers and other stakeholders.

In addition, non-compliance with laws and internal policies can jeopardize our business and our employees. Therefore, every FFT employee is opened to immediately inform internally via the available reporting channels if he or she has become aware of a possible or suspected violation of applicable legal standards or internal FFT guidelines or if there are reasonable grounds to suspect a violation of rules.

Timely reporting of potential violations allows FFT to protect its reputation and take necessary action before they have a negative impact on the Company.

In addition, inquiries from investigating authorities must be promptly referred to the central Legal & Compliance department.

### 2.2 Reporting channels

FFT employees have the following options for reporting potential policy violations:

- ✓ Responsible manager or member of (local) management, if applicable,
- ✓ Responsible central department, e.g. HR

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✓ External whistleblowing office (ombudsperson)

The external whistleblowing office has been set up at the law firm Cornea & Franz in Fulda. Whistleblowers can contact this ombudsperson's office at the e-mail address [ombudsstelle-fft@cornea-franz.de](mailto:ombudsstelle-fft@cornea-franz.de) or the telephone number 0661-901644 0. The contact person for whistleblowers is Attorney at Law Dr. Stephan Wübbelsmann (Deputy: Attorney at Law Christian Semmler). At the whistleblower's request, the external whistleblowing office will anonymize the information it receives.

✓ Internal whistleblowing office

The internal whistleblowing office is located in the Legal & Compliance Department. Whistleblowers may contact this office by e-mail at [whistleblower@fft.de](mailto:whistleblower@fft.de) or by calling the employees listed below. The contact persons for whistleblowers are the Head of Legal & Compliance (+49 661 2926 292) and his deputy (+49 661 2926 2921). Access to the e-mail box at the above e-mail address is restricted to the above persons or their successors in office.

If the suspicion is against a supervisor or team member, a direct report to the external or internal whistleblowing offices is the appropriate solution for a neutral investigation of the matter.

At the whistleblower's request, a face-to-face meeting will be arranged between the whistleblower and a responsible person from the Legal & Compliance Department.

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### 2.3 Reporting process

Regardless of the nature of the report, all reports of actual or suspected misconduct will be taken seriously and investigated. Further details are set out in the Rules of Procedure in **Annex 1**.

#### 2.3.1 Responsibility for the processing of incoming messages

Once a message is received by the responsible manager, the manager forwards it to the Legal & Compliance department for an initial assessment of the risk potential.

All reports are read and processed by the Legal & Compliance department and/or the appropriate departments at headquarters. If a report indicates misconduct involving a manager, employee or member of Legal & Compliance department, it is immediately escalated to the managing directors.

The responsible offices conduct an initial validity check and, depending on the risk potential, decide who is involved in the further handling of the investigation. Unless the tip proves to be obviously false, the responsible offices decide how to proceed and initiate all necessary steps to investigate and resolve the matter. The necessary data and documents are secured and additional documents are requested discreetly.

#### 2.3.2 Low-risk category reports

The consequences of an identified violation in this category relate to possible internal misconduct by employees.

The Legal & Compliance department is responsible for the investigation and appropriate follow-up measures.

This category is used if

- misconduct or inappropriate behaviour towards colleagues/supervisors is reported;
- there is a violation of internal policies or work instructions with no impact on third parties;
- there is a conflict of interest with no impact on third parties.



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### 2.3.3 Medium risk potential category reports

An identified violation in this category affects FFT's core processes and/or has an impact on third parties.

The Legal & Compliance department, in cooperation with Internal Audit department, is responsible for the investigation and appropriate follow-up measures.

This category is used if

- violations of internal policies or procedures exist that impact third parties (e.g. customers or suppliers);
- misconduct that credibly indicates systematic violations or the involvement of middle management;
- suspected violations of law affecting a limited group of individuals;
- the misconduct has an impact on third parties and can be investigated without external media attention.

### 2.3.4 High-risk category reports

The effects of an identified violation of rules in this category endanger the interests of the FFT Group, in particular its financial or reputational interests.

The Legal & Compliance department, the Internal Audit department and the managing directors are involved in the investigation and the decision on follow-up measures.

This Category is used, if

- law enforcement authorities notify FFT that an investigation has been opened or a criminal subpoena has been issued;
- external auditors discover or otherwise obtain information indicating the existence of illegal activity (whether or not material to FFT's financial statements);
- there is a serious breach of legal standards, the FFT Code of Conduct or the ethical principles of the FFT Group;
- it is likely to attract national media attention;
- there is credible evidence of serious misconduct, systemic violations or senior management involvement.

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### 2.4 Process/dealing with reports

All parties involved will be treated respectfully and appropriately. To be fair to all employees, including those who are falsely or mistakenly accused, we conduct initial investigations and assessments to determine whether an investigation is appropriate and, if so, what form it should take.

The presumption of innocence applies in all proceedings. However, this does not stand in the way of personnel measures taken based on reasonable suspicion.

Persons affected will be informed by the Legal & Compliance department that an investigation is being conducted against them if and as soon as this is possible without jeopardizing the purpose of the investigation. They may comment on the allegations during the investigation. They have the right at any time in the proceedings (in particular in cases of personal hearings) to call on the employee representative body to assist in investigations.

Both incriminating and exculpatory information is collected in investigations. Only legally obtained information or evidence will be considered for the investigation process. Investigations are not conducted without suspicion.

Measures taken during the investigation must be suitable, necessary and appropriate to achieve the purpose of the investigation. This also applies mutatis mutandis to measures taken following the investigation, e.g. in response to any misconduct towards the persons concerned.

### 2.5 Information to the whistleblower

Within seven days, the whistleblower will receive confirmation of receipt of the report.

Within three months, the whistleblower will be informed of the actions taken, the status of the internal investigation and its outcome, unless this conflicts with data protection or other legal requirements. If necessary, particularly in complex cases, the whistleblower will receive feedback within six months at the latest.

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## 2.6 Closure of the investigation

Any information provided by the whistleblower that does not contain sufficient information to allow an investigation to be conducted, and if the responsible departments are unable to conduct a meaningful investigation despite requests to the whistleblower, the case will be closed.

Once the facts of the case have been fully clarified and the necessary measures have been taken, the investigation is closed.

For all investigations carried out, a final report is drawn up.

In accordance with the findings of the compliance investigation, necessary follow-up measures are initiated, monitored and documented with the involvement of the business unit concerned.

All reports to the Legal & Compliance department are recorded and archived in compliance with data protection regulations. The whistleblower is informed about the completion of the investigation.



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## 3. Protection of the whistleblower

### 3.1 Legal regulations

The protection of whistleblowers goes far beyond the right to complain enshrined in the Works Constitution Act. The law provides whistleblowers acting in good faith with protection from sanctions if, when reporting, they have reasonable grounds to believe that the information provided is true or if they have a reasonable suspicion that they have observed an unlawful act.

### 3.2 FFT regulations

FFT protects whistleblowers and those close to them (e.g. colleagues and relatives) against any reprisals they suffer or may suffer as a result of making a report. This includes threats and attempts at retaliation.

If a whistleblower makes an allegation in good faith and with a reasonable belief that it is true, but the investigation does not confirm it, FFT will accept the allegation and the whistleblower will not suffer retaliation or other adverse consequences. However, if the whistleblower makes an allegation recklessly, with malicious intent, for the purpose of defamation, or for personal gain, appropriate employment and other actions may be taken to the extent permitted by law.

### 3.3 Confidentiality

FFT will take all reasonable steps to ensure confidentiality throughout the investigation process so that whistleblowers do not fear that their identity or information will be unlawfully disclosed or misused.

If whistleblowers identify themselves in a whistleblower report, their identity will only be disclosed to those involved in the investigation or any subsequent legal proceedings on a strict "need to know" basis.

If the investigation is followed by disciplinary or other proceedings, no action may be taken without the cooperation of the whistleblower, who may be required to testify.

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## 3.4 Documentation and reporting

The internal whistleblowing office shall report annually to FFT's managing directors on all significant aspects of whistleblowing, investigation and corrective actions. This includes whistleblowing reports, their results and disciplinary sanctions taken.

## 4. Terms and definitions used in this document

Justified suspicion	Justified suspicion exists if there are specific indications that a violation of the rules has occurred.
Whistleblower	The whistleblower is the person who draws attention to a rule violation.
Reporting channels	This term covers the various reporting channels for submitting reports.
Report	Reports are information about rule violations that are submitted via the FFT whistleblowing channels.
Rule violation	Rule violations are intentional or negligent violations of applicable law (laws, regulations equivalent to laws, etc.) or internal company rules. The latter include, in particular, violations of the principles of FFT (e.g. Code of Conduct) and the FFT guidelines. Breaches of contractual obligations by employees of the Company shall also be regarded as breaches of regulations.
Rule Violation, Category	The category of a report depends on the risk potential of the confirmed rule violation (low, medium or high) and determines who is internally involved in the investigation of the report.
Whistleblower	Is the English term for whistleblower.

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## 5. Contact person

Contact person for this policy is the Head of Legal & Compliance department at FFT.

Phone: +49 661 2926 2921  
E-mail: stefan.doellinger@fft.de

For the receipt of a report, the whistleblowers have several offices at their disposal, see also reporting channels in accordance with sec. 2.2.

The management of FFT Produktionssysteme GmbH & Co. KG will have compliance with this policy verified by internal auditing both in the context of general audits and by special compliance audits.

## 6. Annex to the guideline

Annex 1: Rules of procedure for the FFT Whistleblowing System  
Annex 2: Process – Whistleblower System (internal)

# IMPRINT



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