

## Description of procedure for reporting incidents

### 1 Purpose

The Röchling Speak Up whistleblowing platform provides guidance on the reporting process for individuals who wish to report incidents.

### 2 What should be reported?

The platform offers all Röchling employees as well as external parties the opportunity to report illegal or unethical behavior within our company or our supply chains. This information can also be provided anonymously. Typical situations may include corruption, fraud, or other violations of our Code of Conduct, but also violations of human rights or environmental obligations.

The report should contain as much detail as possible on the background, the dates and persons involved. Supporting documents should also be included if possible. In most cases, it will be possible to follow up on reports only if they contain sufficient information.

Allegations that are not made in good faith, especially false statements made with malicious intent, will be considered misconduct, will not be tolerated and may result in disciplinary action against employees.

### 3 How can reports be made?

Reports can be made in writing or by telephone. Information can also be provided anonymously. However, it is often important to ask questions and obtain additional information during the course of the investigation. For this reason, we encourage whistleblowers not to submit reports anonymously. Please note that it is not possible to process anonymous reports in some countries.

### 4 What happens to my report?

You will receive acknowledgment of your report within seven days. Your report will be received and evaluated. If there are further questions or if additional information is needed, we will contact you via the Speak Up platform. If you have provided your e-mail address, you will receive an automatic notification. Otherwise, you can log in to the platform with your password and access number to view any messages.

All reports will initially be received and evaluated only by a small predefined group of people. Depending on the circumstances, employees from other departments or external parties may also be involved. During this process, information will be provided only if necessary (on a need-to-know basis). If the accused persons need to be informed, your identity will not be disclosed.

Once the investigation is finished, you will be informed of its completion, as well as the outcome. For reasons of confidentiality, data protection and other legal regulations, we will generally be unable to provide you with comprehensive information about the results of the investigation and any follow-up measures.

### 5 Protection of the whistleblower

Röchling encourages all employees to report incidents without fear of personal consequences. Employees do not have to fear any personal consequences as a result of reports made in good faith that subsequently turn out to be inaccurate.