



**metabo**

# Rules of procedure for the whistleblowing procedure

**at Metabowerke GmbH**

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*Note:*

*For reasons of better readability, the masculine form is used in this document.  
All personal designations apply equally to all genders.*

# I. Introduction and scope of application

Our company group develops and produces power tools to contribute to our society through outstanding technologies, products and services. Our company group is aware of its social responsibility in all its activities and bases this on generally valid, ethical values and principles. Sustainable management is also an essential part of our corporate culture.

Our company group lives these principles and verifies compliance with them, even if the regulations we have imposed on ourselves go beyond the legal requirements.

These rules of procedure are intended to explain the whistleblowing procedure at Metabowerke GmbH in accordance with the German Supply Chain Due Diligence Act (LkSG) and the German Whistleblower Protection Act (HinSchG).

The whistleblowing procedure enables persons to report potential violations of

- Laws, regulations, etc.
- Internal company compliance guidelines and principles of conduct, declaration of human rights (Grundsatzklärung Menschenrechte), etc.
- Human rights and environmental risks and violations of human rights or environmental obligations, and
- Other compliance violations.

The reporting channels are not available for general complaints, customer complaints or warranty inquiries.

# II. Reporting channels and authorized reporters

## 1. Reporting channels

The following channels are available to whistleblowers for reports:

Online	<a href="https://koki-group-eu.integrityline.app/">koki-group-eu.integrityline.app/</a>
Post	<b>CONFIDENTIAL</b> Metabowerke GmbH <b>Chief Compliance Officer</b> Metabo-Allee 1 72622 Nuertingen Germany
Hotline	Chief Compliance Officer + 49 (0)7022 – 72 3111

The whistleblower can choose which reporting channel he wishes to use for his report. If the whistleblower wishes to make a report anonymously, it is recommended to use the online reporting system. Anonymous communication with the whistleblower is also possible via this online reporting system. We therefore recommend that whistleblowers using the online reporting system to log in regularly and to check their own case for new messages. Reports via the online reporting system are free of charge.

In case of a postal report, a whistleblower can decide whether he wishes to leave his contact details.

If a report relates to a specific company, the whistleblower can select this company in the online reporting system and thus enable the report to be processed by this company.



## 2. Contents of a report

Reports should contain the following information:

- **What is your suspicion?** (Description of the incident – what happened when and where and is the incident still ongoing, etc.)
- **In which company did the incident occur?**
- **Where did the incident occur?** (country, city, event, etc.)
- **Is the whistleblower an employee of the company concerned, supplier, customer, etc.?**
- **Who is involved in the incident?** (potential suspicious person)
- **Did anyone observe the incident?** (witnesses)
- **Is there any evidence to prove the incident** (e.g. documents etc.)?

## 3. Authorized reporters

All persons who work for our company group or who are in contact with us in the course of their professional activities and obtain information about a breach of rules in a professional context are entitled to report. These may be, for example, current, future or former employees or managers of our company group, our business partners, customers, suppliers, freelancers, interns or the interested public.

## 4. Recipients of the reports

Reports via the online reporting system are received centrally by the Chief Compliance Officer and his representatives or, if applicable, by a regionally responsible Compliance Officer and his representatives.

The Chief Compliance Officer acts independently and without instructions.

## 5. Conflict of interest

If the Chief Compliance Officer, his representatives, or other employees have a conflict of interest or if the violation was committed by one of these persons themselves, this person will be immediately excluded from the investigation.

## III. Procedure

The processing of all incoming reports follows a structured process, which is described below.

### 1. Confirmation of receipt

Incoming reports are documented and the whistleblower receives a confirmation of receipt of the report within seven days, provided that he has provided us with his contact details or has set up a communication option.

### 2. Checking the report

Only persons who are obliged to secrecy are entrusted with processing the reports.

The first step is to check whether an incoming report falls under the above-mentioned scope of application, if this is not the case, the whistleblower receives corresponding feedback.

### 3. Clarification of the facts

Firstly, the facts of a report are clarified, if possible, with the whistleblower. It may be necessary to involve other specialist departments, such as Human Resources, Data Protection, Purchasing, etc., or external service providers. The identity of the whistleblower is treated confidentially as far as possible.

If necessary, law enforcement authorities are involved, which may be the case in particular if there is a legal obligation to do so or if further clarification of the facts is no longer possible through internal measures but appears necessary.

### 4. Measures

If a report is confirmed, appropriate measures will be examined and, if necessary, taken and followed up.

This may involve sanctions against employees, such as a warning, reprimand or dismissal, whereby the nature and severity of the offence and culpability will of course be given due consideration.

If necessary, criminal charges will be filed.

It may also be necessary to assert claims for damages.

Remedial measures are intended to prevent or stop the violation, or at least minimise it if it is not possible to prevent or stop it.

Furthermore, it is examined whether preventive measures can be taken or expanded and implemented if necessary.

With regard to human rights and environmental risks as well as violations within the meaning of the German LkSG, the whistleblower is given the opportunity to outline his expectations with regard to possible preventive or remedial measures, provided he has made his contact details available or set up another means of communication.

## **5. Conclusion of the procedure**

At the end of the procedure, the results and measures taken are documented and stored in an access-protected manner. The statutory deletion and retention obligations are observed.

Within three months of the report, the whistleblower will receive feedback on the measures planned or already taken, provided he has provided us with his contact details or has set up another means of communication.

In the case of reports relating to human rights and environmental risks as well as violations within the meaning of the German LkSG, we will check whether the results should be discussed with the whistleblower.

## **6. Anonymity and data protection**

Whistleblowers can submit reports anonymously via the online reporting system. The relevant data protection information can be found on the online reporting system

[koki-group-eu.integrityline.app/app-page;appPageName=Privacy%20policy](https://koki-group-eu.integrityline.app/app-page;appPageName=Privacy%20policy)

Further data protection information is available on our website:

[metabo.com/com/en/info/general/data-privacy/](https://metabo.com/com/en/info/general/data-privacy/)

## **7. Protection for whistleblowers**

A whistleblower who makes a report to the best of his knowledge and belief must not be subject to reprisals or threats of reprisals, discrimination or punishment. Reprisals are actions or omissions in a professional context that are triggered by a report or disclosure and which cause or may cause the whistleblower an unjustified disadvantage.

## **8. Confidentiality**

In principle, the identity of the whistleblower and third parties mentioned in the report will be treated confidentially.

The identity of the whistleblower will only be disclosed to those persons responsible for receiving reports or for taking follow-up action, as well as to the persons assisting them in the performance of these tasks.

The duty of confidentiality does not apply if one of the statutory exceptions applies, e.g. Section 9 German HinSchG, or if an authority or a court requests the disclosure of the identity of the whistleblower.

However, it should be noted that the accused person must be informed of the identity of whistleblowers no later than one month after receipt of the report (Art. 14 para. 3a GDPR), unless there is a legal exception (e.g. Section 29 German BDSG).

## **9. Effectiveness**

The effectiveness of the procedure is reviewed at regular intervals and adjusted if necessary.



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