



## **Whistleblowing system of Leonhard Moll AG Group**

Are you aware of grievances or violations of the law within Leonhard Moll AG Group, or do you perhaps have just a suspicion of such? If so, please inform us. In this way you can protect and support us all. We treat your data confidentially. On request you will remain anonymous. We follow up all reports cautiously and responsibly.

Leonhard Moll AG Group has commissioned the law firm Heuking Kühn Lüer Wojtek with the receipt of reports and the initial communication with whistleblowers.

Whistleblowers can submit their reports via the WhistleFox® web form:

[Web form \(German\)](#)

Alternatively, whistleblowers can submit their reports in person, by telephone, by letter or by e-mail to:

Attorney at Law Dr. André-M. Szesny, LL.M.  
Heuking Kühn Lüer Wojtek Partnership of Lawyers mbB  
Georg-Glock-Strasse 4  
40474 Düsseldorf  
Phone 0211/60055-217  
E-mail [a.szesny@heuking.de](mailto:a.szesny@heuking.de)

Please describe the facts of the case as precisely as possible, name the company involved, the persons involved, the time and place of the incident and provide the names of possible witnesses. If possible, also send documents such as pictures, e-mails, etc. that support the suspicion.



## **Frequently asked questions**

### **What can I report?**

You can help us by making a report if you have indications that employees of Leonhard Moll AG Group or other individuals are acting against the interests of our companies or otherwise acting improperly. This includes serious compliance violations and criminal offences such as corruption and fraud, theft and embezzlement, coercion and mobbing, but also other rule violations, such as discrimination, abuse of power or environmental or human rights-related risks and other violations of obligations. Violations that have not yet occurred but appear imminent or planned may and should be reported. Mere suspicions can also be reported. Even if these subsequently turn out to be unfounded, there is no threat of any disadvantages for the whistleblower.

However, the whistleblowing system is not suitable for complaints and reporting emergencies!

### **How are reports made?**

Please describe the facts of the case as precisely as possible to our trusted lawyers. Name the company or organizational unit concerned and people involved, along with the time and place of the event. Also provide the names of possible witnesses.

If possible, also submit documents such as pictures, e-mails, etc. that support your suspicions.

You decide which data you will provide, whether you want to remain anonymous or whether you want to make yourself available to the persons of trust whom we have appointed for follow-up questions.

You will receive confirmation of the receipt of your report within seven days, provided you have given your contact details. You will receive feedback on the further handling of your report and the measures taken within a further three months: please note that, in providing this feedback, we must be careful not to jeopardise any internal investigations that may still be ongoing and that the rights of third parties are not impaired.

Our trusted lawyers will review your report and forward it to the responsible office of Leonhard Moll AG Group in accordance with the law and data protection regulations. The latter will then take the necessary measures, if required.



## **How is my data protected?**

All personal details will be treated confidentially. If you wish, you may submit your report anonymously.

The whistleblowing system complies with applicable legal requirements. All reports are received by lawyers of trust and responsibly processed before they are forwarded to the Leonhard Moll AG Group office in charge of handling whistleblower reports.

The documentation of your report at Leonhard Moll AG Group will be deleted no later than three years after the conclusion of the procedure, insofar as legal regulations do not prevent this.

## **Am I at risk of disadvantages if I make a report?**

Whistleblowers are subject to protection under labour law if they have reasonable grounds to believe that the reported information is true at the time, they share it with the internal Reporting Office.

For this area of protection to apply, the report must concern a matter that falls under the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG) or other relevant laws, i.e. in particular criminal offences and serious administrative offences. The reference must also refer to Leonhard Moll AG Group or another entity with which you as the person making the reference are or were in professional contact.

Whistleblowers may not suffer disadvantages under labour law, even if a reported suspicion subsequently turns out to be unfounded.

## **How can I submit a report?**

There are various reporting channels available to you: You can submit your report to the reporting office via web form, in person, by telephone, by e-mail or by letter using the contact details given above.

You also have the option of submitting your report to a governmental reporting office, such as the external federal reporting office of the German Federal Office of Justice, the external reporting offices set up at the level of the federal states and the external reporting offices responsible for special cases, for example at the German Federal Cartel Office or German Federal Financial Supervisory Authority. You can also send your report to European Union institutions, bodies, offices or agencies. These include, for example, the external reporting channels of the Commission or the European Anti-Fraud Office (OLAF). You can find the contact details



on the website of the respective authority. Upon request, we or our trusted lawyers will be happy to provide you with further information on the external reporting procedures.

However, the law stipulates that whistleblower should give preference to reporting to the aforementioned internal reporting office over the external reporting office if effective action can be taken against violations internally.

### **Whom can I contact if I am unsure of whether I should use the whistleblowing system?**

You can contact the reporting office by telephone or e-mail using the contact details given above if you have any queries. If in doubt, however, it does make sense to use the whistleblowing system. Our lawyers of trust handle incoming reports carefully and conscientiously and process them based on a wealth of experience.

### **Data protection:**

For the data processing of whistleblower reports within the Leonhard Moll AG Group, the [data protection notices of the Leonhard Moll AG Group](#) apply.

The [data protection information of Heuking Kühn Lüer Wojtek](#) applies to data processing by Heuking Kühn Lüer Wojtek.