



Whistleblower Policy

1. PURPOSE OF THE DIRECTIVE

This policy regulates the receipt, processing and follow-up of information about possible legal violations within the Fischbach Group in accordance with the German Whistleblower Protection Act (HinSchG).

The aim is to

- identify violations of the law at an early stage,
- minimize risks to the company,
- ensure compliance and integrity,
- protect whistleblowers from discrimination and
- strengthen a trusting corporate culture.

2. SCOPE

This policy applies to

- All employees
- Management
- Executives
- Apprentices
- Interns
- Temporary workers
- Former employees
- Applicants
- External business partners, insofar as they become aware of relevant violations in the course of their professional activities.

3. WHAT FACTS CAN BE REPORTED?

In particular reports can be made with references to

- Criminal offences
- Administrative offences
- Corruption/bribery
- Fraud or embezzlement
- Data protection violations
- Health and labor law violations
- Discrimination or harassment
- Environmental or safety violations
- Violations of internal compliance rules with legal relevance



This guideline does not cover general complaints without legal relevance (e.g. pure differences of opinion in the team), unless there are legally relevant facts.

4. INTERNAL REPORTING OFFICE

The internal reporting office is set up at

HR department Fischbach GmbH in Engelskirchen

meldestelle@fischbach-fi.com

The reporting office works independently and confidentially.
Access to information is only granted to the persons named for this purpose.

5. CONFIDENTIALITY AND DATA PROTECTION

The identity

- of the whistleblower
- of relevant persons
- other persons named in the notice

will be treated with strictest confidence.

Personal data will be processed exclusively for the purpose of processing the notice and will be stored in accordance with the applicable data protection regulations.
Disclosure will only take place if this is required by law or necessary for investigation.

6. PROTECTION AGAINST DISCRIMINATION

Whistleblowers must not experience any disadvantages as a result of a report.
In particular, the following are prohibited

- Termination
- Refusal of promotion
- Discrimination in remuneration
- Transfer of job for irrelevant reasons
- Intimidation or bullying

Reprisals are not tolerated and can have consequences under labor law.



7. PROCEDURE

Receipt of the report

Reports can be made in writing or orally.

Anonymous tips are also checked, as far as proper processing is possible.

Confirmation of receipt

The internal reporting office will confirm receipt within **7 calendar days**.

Validation

Following

- Plausibility check
- Legal classification
- If necessary, queries to the whistleblower
- Definition of necessary follow-up actions

Measures

Possible measures

- Internal investigation
- Involvement of specialist departments
- Compliance/HR measures
- Process adjustments
- Notification to relevant authorities

Feedback

Within **3 months** at the latest, the whistleblower receives feedback on planned or already implemented measures, as far as legally permissible.

8. DOCUMENTATION

Each report is documented with

- Date of receipt
- Reporting channel
- Facts of the case
- Processing status
- Measures
- Closing date

Documents are stored confidentially.



9. ABUSE OF THE REPORTING SYSTEM

Deliberately false reports are inadmissible.
Intentional misuse can have consequences under labor law or legal law.

10. ENTRY INTO FORCE

This Directive shall become effective from **June 1, 2026**.
The management of Fischbach GmbH is responsible for the implementation and regular review.

Engelskirchen, June 1, 2026

Martin Herrenbrück
CEO

Martin Schilcher
CFO