

Whistleblower protection

This document provides information on the structures and procedures set up at Memodo for the implementation of the EU Whistleblower Directive (EU) 2019/1937 and the German Whistleblower Protection Act (HinSchG) and describes the available reporting channels and how to deal with incoming information.

1. Material scope of application

In particular, information can be provided regarding violations of:

- public procurement,
- financial services, financial products and financial markets, as well as the prevention of money laundering and terrorist financing,
- Product safety and compliance,
- Road safety,
- environmental protection,
- radiation protection and nuclear safety,
- Food and feed safety, animal health and welfare,
- public health,
- consumer protection,
- protection of privacy and personal data and security of network and information systems;
- the financial interests of the Union as defined in Article 325 TFEU and in accordance with the more detailed definitions set out in relevant Union actions;
- the internal market rules within the meaning of Article 26(2) TFEU, including infringements of Union rules on competition and state aid, as well as infringements of internal market rules in relation to acts that infringe corporate tax rules or in relation to agreements aimed at obtaining a tax advantage contrary to the object or purpose of the applicable corporate tax law.

2. Personal scope of application

You can report violations if you are a whistleblower within the meaning of **DIRECTIVE (EU) 2019/1937**. Whistleblowers are:

- workers within the meaning of Article 45(1) TFEU, including officials;
- self-employed persons within the meaning of Article 49 TFEU;
- shareholders and persons who are members of the administrative, management or supervisory body of a company, including non-executive directors, as well as volunteers and paid or unpaid trainees;
- Individuals who work under the supervision and direction of contractors, subcontractors, and suppliers.
- This policy also applies to whistleblowers who report or disclose information about breaches that they have become aware of in the course of an employment relationship that has since ended.

- This policy also applies to whistleblowers whose employment relationship has not yet started and who have obtained information about breaches during the recruitment process or other pre-contractual negotiations.
- third parties associated with the whistleblowers who could suffer retaliation in a professional context, such as colleagues or relatives of the whistleblower, and
- legal entities owned by the reporting person or for which the reporting person works or with whom he or she is otherwise associated in a professional context.

3. Required information

Please include your first and last name and email address or a telephone number. Anonymous tips do not have to be taken into account.

4. Next steps

Receipt of a report will be acknowledged within 7 days. Within 3 months, we will have reviewed and evaluated the tip. We will then inform you of what actions have been taken, such as initiating internal investigations or forwarding the report to the competent authority.

5. Confidentiality and data protection

Responsible for data protection within the framework of the Whistleblower Protection Act:

Memodo GmbH
Linprunstraße 16
80335 München
Germany

compliance@memodo.de

The collection, processing and use of your personal data, which you provide in the course of contacting us, is governed by the statutory provisions and in accordance with this privacy policy.

We need your email address, as well as your last and first name in order to be able to process your request. On a voluntary basis, you can also provide us with further data such as e.g. Your postal address. Contacting us is always voluntary. We collect, store and use your data for the purpose of contacting you as requested, in accordance with Art. 6 (1) (b) GDPR. The message you send will be processed exclusively by the Compliance Department. Your details will be stored for the purpose of contacting us as requested. If you do not wish to contact us any further, you can inform us directly. Your data will then be anonymised immediately and will be used exclusively for statistical purposes.

We will delete your personal data immediately after the conclusion of the proceedings, unless this is contrary to statutory retention obligations.