

	Whistleblowing - Policy Piller Group	WN 91.9.702.1166-000 10.06.2021
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Part I: Policy details

1. What does this policy cover, and who is covered?

All employees, contractors, consultants, officers, applicant employees, interns, casual and agency workers of Piller Group GmbH and its subsidiaries (hereinafter collectively "Piller") are covered by this policy.

It sets out what someone should do if they have good reason to believe that something **dangerous, unlawful** or **unethical** is going on at work and it is affecting (or risks affecting) them or others.

When you report these kinds of concerns, this is called whistleblowing.

We are committed to operating at all times, and in everything that we do, to the highest standards of integrity. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes.

Please follow the procedure outlined at Part II of this policy to immediately report any serious concerns that you have about this kind of conduct, so that we can take the necessary action to address these concerns as fast as possible.

This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. If you have concerns about a third party, please also raise them with us before approaching anyone else. Head of Personnel Management or their successor in title will be able to explain how you should proceed.

We will always take your concerns seriously and where appropriate, they will be thoroughly investigated by suitable personnel. Most importantly, you should feel that you can follow the Part II procedure with confidence. There will be no reprisals for individuals who bring these concerns to our attention – we value and respect all such reports and those who make them to us. We all play an important role in ensuring that our business and everyone working in and with it acts professionally, lawfully and appropriately.

2. This policy is not part of your employment contract

This policy is not contractual and may be amended from time to time.

3. What sort of activities are typically considered relevant to whistleblowing?

This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing could include:

- Any activity you have reasonable grounds to suspect is criminal
- Any activity you have reasonable grounds to suspect may severely damage the environment
- Any activity you have reasonable grounds to suspect breaches our policy on bribery and corruption
- Any activity you have reasonable grounds to suspect breaches Health and Safety laws
- Any activity you have reasonable grounds to suspect breaches Slavery and Human Trafficking laws
- Any activity you have reasonable grounds to suspect breaches other legal obligations
- Any activity you have reasonable grounds to suspect is an attempt to conceal one or more of these activities

Please speak to Head of Personnel Management or their successor in title if you are unsure whether something that you are concerned about is covered by this policy.

Employment Discrimination, Harassment, or Bullying

If your concern involves unlawful employment discrimination or harassment, or bullying, this policy does not apply. Our employee handbook and/or human resources procedures will guide you on how to proceed and explain applicable protections from any reprisal or retaliation.

4. Confidentiality and anonymity

You are always encouraged to raise concerns openly, and we actively discourage anonymous whistleblowing. This is because it is not always easy to manage and to investigate anonymous reports, especially since if we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. In these circumstances, we risk missing evidence or opportunities to gather important supporting information, or identify helpful witnesses, because we may simply be unaware of their existence, in spite of our best efforts to uncover them.

However, if you prefer to keep your identity anonymous outside of any investigating team, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible. If we need to disclose your identity to others as part of the investigation, we will always discuss with you beforehand both our desire and our reasons for wishing to identify you.

We will protect you from reprisals, and you can read more about how we do this and what rights you have in section 5 below.

5. We protect Whistleblowers

Even if your complaint is mistaken or if, following our investigations (which we will always conduct thoroughly and conscientiously), we conclude that there was no breach of law, policy, or unethical conduct, there will be no reprisal for making the complaint or otherwise participating in an investigation. However, to qualify for protection, the disclosure must, in the **reasonable belief** of the worker making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure:

- A criminal offence
- Failure to comply with any legal obligation
- Miscarriage of justice
- Danger to health & safety of any individual (See note below)
- Significant damage to the environment, or,
- Deliberate concealment of any of any of the above.

Note: General matters related to concerns about Health and Safety in the workplace do not form part of this whistleblowing policy and should be addressed through the routine H&S meetings that take place in your company between the company and the employees or their representatives.

If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you must inform us immediately. You should inform Managing Director Operations in the first instance and if you are not satisfied with the outcome of that conversation, you should raise a grievance with human resources.

We also protect whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others and this is considered to be adequately proven or probable, (including having received threats as a result of raising their concerns), we will take proportionate disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct.

6. Whistleblowing to other outside of Piller

Our policy covers the process for raising, investigating, and resolving wrongdoing within Piller's workplace.

The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns raised and to protect you as part of this process.

For these reasons, we anticipate that it would be extremely rare for you to need to involve anyone outside of Piller as part of this process.

However, we recognise that potentially, in certain circumstances, you might wish to involve an external body directly associated with your concern – an industry regulator for example. However in any case, we would expect that you follow the procedure set out in Part II and consult first, at least one of the nominated persons whenever it is possible to do so.

Involving the press/media

Involving the media in a whistleblowing matter often has the effect of inflaming the situation, not assisting it. It can significantly hamper evidence gathering and the willingness of other relevant individuals to support the process.

We therefore encourage you to take all reasonable steps to deal with the matter internally, and/or with an external regulator, before involving the press/media.

Part II: Our procedure for raising a whistleblowing concern

Please follow this procedure:

- Raise your concerns with Managing Director Operations in the first instance. You may do so in writing or in person.
- If you would prefer not to discuss your concerns with Managing Director Operations, you should write to Managing Director Global Business.
- Please explain that you are raising your concerns as part of the Piller Group whistleblowing policy and procedure. Then set out all the key facts, including names of those involved and all relevant dates.
- You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring someone with you to this meeting – and any subsequent meetings. That companion may be a colleague (or a trade union representative, if relevant). Anyone who accompanies you will be asked to agree in writing to keep strictly confidential the contents of the meeting including any materials disclosed and/or examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you. Depending upon the nature of the concerns, this confidentiality obligation may extend indefinitely but this will be explained to the companion at the start.
- Following this meeting, we will investigate the matters raised and we may request that you come to additional meetings to assist us in our efforts. We may also decide to involve relevant external (or internal) specialists to help us conduct a thorough, fair and responsible investigation.
- Our relevant personnel involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that we may decide to take on our own behalf, we may not be able to share every detail of our discoveries or deliberations with you. We will always endeavour however, to reassure you, as best as we can of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
- It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to complain to Managing Director Operations and request a review of what has been done and concluded.

If you have raised a concern in good faith, our process and all those involved in giving effect to it will support and protect you. However, if a false concern is raised with us in bad faith (e.g. for malicious reasons), we will invoke our disciplinary policy and you may be subject to disciplinary action.