

# WHISTLEBLOWING PLATFORM

in cooperation with DEKRA.

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## 1. Introduction

The FIXIT GRUPPE has set up an internal reporting office where information on grievances and misconduct can be submitted. This reporting office is managed by DEKRA Assurance Services GmbH (DASS) to ensure an objective review.

Your reports are an important contribution to the detection and rectification of breaches of regulations and support quality and risk management as well as adherence to compliance guidelines.

## 2. What can be reported?

Online reporting channel:	dass.teambeam.de/hinweis (encrypted)
E-mail:	hinweis.assurance.de@dekra.com (unencrypted)
Telephone:	+49 7117861-2424
Address:	DEKRA Assurance Services GmbH
	Handwerksstraße
	70565 Stuttgart

## 3. What can be reported?

Violations of criminal laws and certain regulations subject to fines, in particular Regulations on:

- Protection of employees
- environmental protection
- Consumer protection and data protection
- Combating fraud and money laundering

## 4. Who can submit a report?

- Employees of the FIXIT GRUPPE
- All persons in business contact with the FIXIT GRUPPE

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## 5. Procedure of the reporting process

#### 5.1. Receipt of the message

#### The report is received by DEKRA's internal reporting office.

#### 5.2. Confirmation of receipt

The person making the notification receives a confirmation of receipt when the channel is used (usually within 7 days). If a report is submitted in person, the whistleblower is also given the opportunity to check the report log afterwards.

#### 5.3. Checking the message

- The internal reporting office checks the report for credibility and plausibility on the basis of the facts reported.
- Although anonymous reports are recorded and, where possible, documented, they cannot be processed further due to a lack of opportunities for further enquiries.
- Unbelievable, incomprehensible reports or reports that have no connection with the FIXIT GRUPPE are processed, but no further action is taken.

#### 5.4. Decision on further measures

The Reporting Office checks whether further measures need to be taken and cooperates with the office responsible for further clarification at the FIXIT GRUPPE

#### Potential follow-up measures:

- Contacting the whistleblower if the report was not submitted anonymously and there are still questions regarding the assessment.
- Contacting the FIXIT GRUPPE to discuss further steps, e.g. submission to the legal counsel of the FIXIT GRUPPE while maintaining legal confidentiality and the protective rights under the Whistleblower Protection Act.
- Initiation of an internal investigation with the persons or department concerned.
- Referral of the whistleblower to another competent body or authority.
- Closure of the procedure without the initiation of further measures due to a lack of evidence or other reasons, e.g. the Whistleblower Protection Act is not relevant.

#### 5.5. Internal clarification and investigation

- Relevant and credible reports can be forwarded to the responsible office at the FIXIT GRUPPE.
- Once the report has been submitted, the responsible office will clarify the facts internally and carry out further investigations.
- The identity of the reporting person will only be disclosed by the internal reporting office if this is necessary for further processing or if consent has been given.

#### 5.6. Conclusion and feedback

The procedure is officially concluded and the whistleblower is informed of the outcome of the procedure and the reasons for the decision taken. This feedback is usually provided within three months.

## 6. What data and facts must be have to be reported?

- Name of the company (FIXIT GRUPPE)
- Contact details of the whistleblower (name, e-mail, telephone number) for contacting, confirmation of receipt and possible queries by the internal reporting office
- Type and nature of the violation
  - What happened where, when and how and is it still ongoing? (Description of the incident/event, persons affected, witnesses, person responsible/cause, extent of damage)
  - Which regulation, compliance guideline, ordinance or law(s) was (were) violated?
  - Who has already been informed? Are there already investigations by external/public bodies?
  - Is evidence (e.g. documents, photos, videos) available?

Important: It is important that the facts to be reported are described as precisely as possible in order to ensure complete clarification. The whistleblower does not have to be able to prove the violation beyond doubt. A suspicion can also be reported if there is at least a concrete and well-founded suspicion of a violation.

### 7. How are whistleblowers protected?

- The whistleblower remains anonymous at all times, unless he or she deliberately submits the report by name.
- Whistleblowers are protected by law: There is no discrimination as a result of a report.
- However, this protection only applies if the report was justified, e.g. deliberate or grossly negligent false reports are not covered and can lead to consequences under employment law!
- Exceptions to the confidentiality requirement may exist, for example, if there are judicial or official obligations to report (§ 9 HinSchG).

## 8. Information on data protection

- At all stages of the registration process, personal data is processed in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).
- This applies to the personal data of both the person making the report and the person(s) affected by the report.
- The processing of the report by the internal reporting office is governed by an processing in accordance with GDPR Art. 28.
- The FIXIT GRUPPES's own privacy policy applies to the processing of the report.