

Group Procedure

Whistleblower System

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Brief description:

This Group Procedure describes the Dussmann Group's whistleblower system for reporting violations of legal provisions and the Dussmann Group Code of Conduct.



Content

1	Contents	3
1.1	Goal of the whistleblower system	3
1.2	Scope of application of the whistleblower system	3
1.3	Who can submit reports?	3
1.4	Reporting channels	3
1.4.1	Whistleblower Software “Integrity Line”	3
1.4.2	Other Channels	4
1.5	Submitting reports	4
1.5.1	Contents	4
1.5.2	Excluding false reports	4
1.5.3	Anonymous reports	5
1.6	Processing reports	5
1.6.1	Communication with the whistleblower	5
1.6.2	Investigation of reports and initiation of measures	5
1.7	Protection of whistleblowers and accused persons	5
1.7.1	Confidentiality	5
1.7.2	Prohibition of retaliation	5
1.7.3	Fair process	6
1.8	Consequences of violations	6
1.9	Data protection	6
2	Annexes	6



1 Contents

1.1 Goal of the whistleblower system

The Dussmann Group maintains a whistleblower system to learn about potential serious violations in the company in due time and to be able to follow up on information appropriately. A whistleblower system is an efficient early warning system for identifying and combating misconduct. It presents an opportunity to clarify suspected cases internally, minimize financial and reputational damage and implement measures for the future. Reports via the whistleblower system are subject to confidentiality and persons who make use of the internal whistleblower system are protected from being penalized.

1.2 Scope of application of the whistleblower system

The whistleblower system can be used to report potential violations of **applicable legal provisions** and the **Dussmann Group Code of Conduct** in the company's own business and its supply chain. This includes, but is not limited to:

- Criminal offenses such as corruption, fraud or embezzlement
- Offenses punishable by fines
- Conduct that violates antitrust law
- Violations of human rights, in particular the prohibition of discrimination
- Harassment and abuse
- Other serious breaches of obligations and internal guidelines
- As well as other possible violation of applicable law

This also includes information or complaints regarding human rights or environmental risks and breaches of duty listed in Section 2 Paragraphs 2 and 3 of the German Supply Chain Due Diligence Act.

The whistleblower system is not a general complaints office.

1.3 Who can submit reports?

All Dussmann Group employees and external parties, such as applicants, former employees, business partners or suppliers, can submit reports via the whistleblower system.

1.4 Reporting channels

Reports of a potential violation can be submitted to the responsible reporting office through various channels.

1.4.1 Whistleblower Software "Integrity Line"

Reports of violation can preferably be submitted via the whistleblower software "Integrity Line" in various languages under the conditions of local whistleblower protection laws to ensure secure, confidential, and efficient processing. Reports can be submitted there in writing or as voice message.



You can access the Integrity Line via the following link: dussmanngroup.integrityline.app

1.4.2 Other Channels

Furthermore, whistleblowers have additional options for submitting reports to the Group Compliance department or the local reporting offices in the group companies.

Group Compliance

- e-mail: compliance@dussmanngroup.com
- telephone: +49 30 2025 1047
- post: Group Compliance, Friedrichstraße 90, D-10117 Berlin, Germany
- personal contact

Local reporting channels in the group companies

The external reporting channels for the group companies are listed in [Annex 1 Local reporting channels in the whistleblower system](#).

1.5 Submitting reports

1.5.1 Contents

It is important to make available all relevant information to effectively clarify a report.

If possible, a report should contain the following information:

Where?	Where did the incident occur or where does it show its effects? In which company and in which branch/department or area did it occur?
When?	When was the violation committed? The period should be narrowed down as precisely as possible.
What?	What happened? What was or is being done? Has any damage occurred? A precise (not lengthy) description of the facts is helpful.
Who?	Who committed a violation or is very likely to commit one? Which persons are involved in the incident?
How?	How was the violation committed? How did you learn about it? Relevant details help to bring about a quick and effective clarification.

If documents or other evidence are available to support the report, upload them to the Integrity Line or send them encrypted via email or marked as confidential by post to the reporting office.

1.5.2 Excluding false reports

Only information that can be assumed to be correct to the best of your knowledge may be made available to prevent misuse of the whistleblower system. Deliberate false reports and false information are not tolerated. If whistleblowers are not sure whether the information provided is correct, it must be explicitly stated that the information made available is based on suspicion or assumption.

1.5.3 Anonymous reports

Reports can also be submitted anonymously, without revealing your identity, and will be processed by the reporting office if this is possible based on the available information. Anonymous reports that are not plausible and where there is no possibility of contacting the person making the report to obtain further information will not be processed.

1.6 Processing reports

Reports received are processed by the persons designated as the responsible internal reporting office who are bound to confidentiality.

1.6.1 Communication with the whistleblower

Communication between the whistleblower and the processing office takes place via the Integrity Line. When a report is submitted, the whistleblower receives a case ID and sets a password which allows them to access their report and contact the reporting office via a secure inbox at any time.

After submission, whistleblowers receive confirmation of receipt from the office responsible within the legally stipulated period, see [Annex 2 Local periods](#). If necessary, follow-up questions may be asked during the investigation, or additional information or documents may be requested. Finally, the whistleblower receives feedback on the actions taken or reasons for rejecting the investigation within the legally stipulated period, see [Annex 2 Local periods](#).

1.6.2 Investigation of reports and initiation of measures

The office responsible for processing the report initially assesses whether the report is plausible and valid. A review is undertaken as to whether there is reasonable suspicion that permits further investigation and possible measures. If the report is plausible, an investigation is initiated, which includes, for example, analyzing data or conducting interviews with the involved parties.

Based on the results of the investigation, measures to rectify the violation and possible steps to prevent future misconduct, such as training or process adjustments, are initiated if necessary. Personal consequences may also apply, see [1.8](#).

1.7 Protection of whistleblowers and accused persons

1.7.1 Confidentiality

Reporting offices maintain confidentiality of the identity of the whistleblower, the persons who are subject of a report and other persons mentioned in the report.

1.7.2 Prohibition of retaliation

Any form of retaliation or discrimination that directly or indirectly affect the working conditions of the whistleblower for reasons directly or indirectly related to the reporting is not permitted, provided the whistleblower permissibly exercises his or her rights. Retaliation includes dismis-



sal, demotion, unjustified transfer, unjustified disciplinary measures, harassment in the workplace, bullying and any other reprimand measures. The Dussmann Group companies are obliged to protecting whistleblowers from being penalized or discriminated against due to a report.

The prohibition of retaliation also extends to natural or legal persons who support the whistleblower in making the report (e.g., colleagues, union members, or organizations).

1.7.3 Fair process

Investigations follow a fair process. Accused persons are presumed innocent until a violation has been proven.

1.8 Consequences of violations

Disciplinary measures may be taken in the case of significant violation, for example in the following cases

- If the responsible body concludes after investigation that a violation has been committed by one or more persons
- In the case of abusive behavior by the whistleblower
- In the case of retaliatory or discriminatory behavior against the whistleblower
- In the case of a breach of confidentiality obligations in conjunction with processing reports

Examples of disciplinary measures, depending on the severity of the violation, include:

- Verbal warnings
- Formal written sanctions
- Release from duties
- Dismissal with or without notice

1.9 Data protection

Information about the collection, processing and use of personal data in the context of the whistleblower system is available in the data protection statement for the Dussmann Group whistleblower system.

2 Annexes

- [Annex 1: Local reporting channels in the whistleblower system](#)
- [Annex 2: Local periods](#)

Annex 1 Local reporting channels in the whistleblower system

In the countries, there are also external reporting offices that are not covered by the Dussmann Group whistleblower system.

Country/ entity	External reporting channel *
Germany	Bundesamt für Justiz Hinweisgeberstelle (dataport.de)
Estonia	-
Ireland / STS	Protected Disclosures Commissioner OPDC - Office of the Protected Disclosures Commissioner (OPDC)
Italy	Autorità Nazionale Anticorruzione – ANAC Whistleblowing - www.anticorruzione.it
Lithuania	Lietuvos Respublikos prokuratūra Lietuvos Respublikos prokuratūra
Luxembourg	Ministerium der Justiz, Meldeamt für Hinweisgeber Meldeamt für Hinweisgeber - Guichet.lu - Luxembourg
Austria	Bundesamt für Korruptionsprävention und Korruptionsbekämpfung (BAK) Meldestellen (bak.gv.at)
Poland	Rzecznik Praw Obywatelskich Formularz zgłoszenia zewnętrznego Procedura zgłoszeń zewnętrznych
Romania	Agenția Națională de Integritate Agenția Națională de Integritate – Site oficial – Agenția Națională de Integritate

* Only one authority has been linked as an external reporting channel; there may be others.

Country/ entity	External reporting channel *
Czech Republic	Ministerstvo spravedlnosti České republiky https://oznamovatel.justice.cz/chci-podat-oznameni/
Hungary	Integritas Hatosag Főoldal - Integritás Hatóság
Saudi Arabia	-
Switzerland	-
United Arab Emirates	-
Vietnam	-

* Only one authority has been linked as an external reporting channel; there may be others.

External reporting channels

Irrespective of the process for submitting internal reports described in this Group Procedure, a whistleblower can submit a report to an external reporting channel. This is necessary, for example, if no follow-up measures has been adopted at the company within the period for submitting feedback or if feedback has not been received or if the whistleblower has reasonable grounds to believe that the violation of the law could pose a direct or obvious threat to the public interest, in particular if there is a risk of irreversible damage or if the whistleblower would be exposed to retaliatory measures by submitting an internal report. Reporting to the external reporting channel without submitting an internal report will not result in the whistleblower being deprived of the protection afforded by the provisions of whistleblower protection law. The external reporting channels of national authorities are supplemented by external reporting procedures of institutions, bodies, offices or agencies of the European Union.

Reporting via internal reporting channels is generally preferable.

Annex 2 Local periods

This overview lists the periods that apply in the respective countries for the confirmation of receipt of the report and the feedback to the whistleblower. The “Start” column specifies when the deadline commences.

Country	Confirmation of receipt		Feedback	
	Period	Start	Period	Start
Germany	7 days	Receipt of the report	3 months	Confirmation of receipt
Estonia	7 days	Receipt of the report	3 months	Confirmation of receipt
Ireland	7 days	Receipt of the report	3 months	Confirmation of receipt
Italy	7 days	Receipt of the report	3 months	Confirmation of receipt
Lithuania	2 days	Receipt of the report	10 days	Confirmation of receipt
Luxembourg	7 days	Receipt of the report	3 months	Confirmation of receipt
Austria	7 days	Receipt of the report	3 months	Confirmation of receipt
Poland	7 days	Receipt of the report	3 months	Confirmation of receipt
Romania	7 days	Receipt of the report	3 months	Confirmation of receipt
Czech Republic	7 days	Receipt of the report	30 days	Receipt of the report

Country	Confirmation of receipt		Feedback	
	Period	Start	Period	Start
Hungary	7 days	Receipt of the report	30 days	Receipt of the report
Saudi Arabia	7 days	Receipt of the report	3 months	Confirmation of receipt
Switzerland	7 days	Receipt of the report	3 months	Confirmation of receipt
United Arab Emirates	7 days	Receipt of the report	3 months	Confirmation of receipt
Vietnam	7 days	Receipt of the report	3 months	Confirmation of receipt