

DOVISTA - Whistleblower Policy



Whistleblower Policy

Introduction

The Purpose of the Whistleblower Policy

The management of the DOVISTA Group wishes to encourage an open dialogue on all compliance issues related to DOVISTA business methods, internal policies Code of Conduct and laws and regulations.

This whistleblower system is for everyone to voice their concern if they become aware of illegal or unethical business conduct or of serious violation of internal rules and policies.

If you are a DOVISTA employee, we encourage you to discuss any concerns with your immediate manager, senior management or People, Culture & Communication (HR). If you are not comfortable with contacting a manager or People, Culture & Communication (HR), or if you believe that the issue or offence has not been handled correctly, you can report the issue in accordance with this policy in the DOVISTA whistleblower system.

The purpose of the system is to ensure that illegal or unethical conduct by DOVISTA employees, or others with a relation to the DOVISTA Group, can easily and securely be reported to an impartial function under observation of the General Data Protection Regulation. Furthermore, we want to ensure that reporting can be done at any time and that you are not subject to harassment, discrimination, or other kind of retaliation if you use our whistleblower system in good faith.

The Objective of the Whistleblower Policy

The objective of the whistleblower policy is to explain how the whistleblower system works and to address inquiries that users could have - thus minimising any potential reluctance to report concerns.

The policy describes the necessary elements of a consistent complaints handling procedure, where all reports are addressed thoroughly through an impartial and objective investigation, with the highest level of confidentiality and fairness, while acknowledging and respecting relevant national and regional legislation and regulatory standards.

The policy includes measures to ensure appropriate protection for persons who file a report via the whistleblower system and to ensure that persons accused of misconduct are afforded the right of due process by way of opportunities to provide a defense against any allegations before the adoption of a resolution.

Where to Report

The whistleblower system is an external web portal accessible from DOVISTA websites and from DOVISTA Daylight intranet. Reports can only be made electronically.

The web portal is hosted and operated by an external party (ESQ Group AG). The system and the internal complaints handling procedures ensure impartiality and objectivity in the assessment and handling of reports.

What to Report

The whistleblower system can be used for reporting serious offences that may affect DOVISTA or that may have an impact on the life or well-being of a person. Examples are:

- financial reporting, fraud, and embezzlement,
- bribery, corruption, and conflict of interest,
- harassment, threats, violence, bullying, and discrimination - by an internal or external party,
- competition law and other legal compliance regulations e.g., GDPR,
- human rights, work environment and work safety,
- environment legislation and pollution of the environment, and
- other matters which may inflict financial losses on DOVISTA, damage its reputation, or have other negative effects on the business and/or the people involved.

Matters such as dissatisfaction with terms of employment (wages or other contractual conditions), work-related disagreements with colleagues and supervisors, violation of alcohol policy etc. should not be reported via the whistleblower system.

These concerns should be raised through the normal reporting channels, i.e., via management, People, Culture & Communication, or personnel representatives. If you file a report that cannot be dealt with under the whistleblower system, we will inform you and advise you to go through the normal channels instead.

We continue to encourage open and constructive dialogue with your colleagues and with your manager with the aim of mitigating or settling workplace disagreements and day-to-day problems.

How to Report

Concerns may be reported via the DOVISTA whistleblower system through this link:

<https://dovista.whistleblownetwork.net/>

Alternatively, concerns may be reported via external reporting channels established by designated local authorities, see:

<https://www.eqs.com/external-reporting-channels/>

We encourage reporting via our Internal whistleblower system before reporting via external reporting channels, but you may freely choose which channel to use.

Anonymity

We understand that you may not wish to identify yourself, in which case you may submit your report to the system anonymously.

In this event, you should be careful not to inadvertently state your name anywhere in your report. We will still be able to communicate with you via the whistleblower portal, though, of course, without knowing who you are.

Your anonymity will be always respected, but you should be aware that it may complicate the investigation. Even if you choose not to be anonymous, the whistleblower Committee will keep your identity in full confidence both internally and externally.

We may ask for your permission to disclose your identity if required to conduct adequate investigation, to comply with law and/or to provide accused individuals with their legal rights of defense.

If the whistleblower reporting concerns one or more named persons, these persons are entitled to protection of their identity in accordance with this policy.

How we handle your Report

All reports made via the whistleblower system will be received by a small impartial whistleblower committee (the "Committee") consisting of four people: DOVISTA Chief Human Resources Officer, DOVISTA General Counsel, VKR General Counsel and VKR Head of Compliance.

If the report submitted involves an individual within the Committee, the information will be made available to a member of the Executive Group Management.

If the report involves a member of the Executive Group Management, the information will be made available to the Chairman of the Audit Committee. In all cases, the whistleblower will receive an acknowledgement of receipt within seven (7) days.

Through an initial screening, the Committee will validate that the information submitted is within the scope of concerns that may be reported to the whistleblower system.

If the report is considered out of scope, the whistleblower will receive information about this with an invitation to go through the normal reporting channels.

If the report is within scope, the Committee will determine the relevant competencies needed for the assessment of the report and initiate the analysis of the information received.

In all cases the Committee will ensure diligent follow-up by the designated handler and ensure feedback to the reporter within reasonable time, not exceeding 3 months.

If the allegations turn out to be unfounded, the report will be classified as non-substantiated, and the whistleblower will be informed of the case closure.

If the allegations turn out to be substantiated, the investigation will continue until the matter has been thoroughly analysed and a conclusion has been reached. During the investigation, relevant authorities (including the police) may become involved.

Upon conclusion of the case, corrective measures may be applicable such as sanctions against businesses or employee(s) involved in the misconduct.

Your Protection against Retaliation

The whistleblower system is a cloud-based reporting tool hosted by an independent third party, EQS Group AG. All data transmitted through the whistleblower system are encrypted and IP logging restrictions are installed on the whistleblower portal.

The Committee will handle all concerns raised with the appropriate high degree of confidentiality. All those involved in investigating and an allegation will respect the need for confidentiality to the highest extent possible.

DOVISTA prohibits and will not tolerate retaliation against any employee who comes forward to raise, in good faith, a concern about a violation of laws and/or regulations, of our code of conduct or of internal rules and policies; or who assists DOVISTA or a law enforcement authority, by providing information to address a concern. Retaliation includes, but is not limited to, adverse employment actions such as termination, compensation decrease, demotion, harassment, discrimination, poor work assignments and threats of physical harm.

Any whistleblower who believes he or she is being retaliated against should file a report about this in the whistleblower system. Retaliation may lead to disciplinary action being taken, up to and including termination of employment of the individual who is retaliating.

The abovementioned protection applies not only to the whistleblower, but also to any facilitators, third parties or others, who are connected to whistleblower and are in risk of being exposed to retaliation.

Data Protection

Reporting of concerns via the whistleblower system may involve processing of personal information and sensitive personal information of the person reporting, the alleged wrongdoers, the witnesses, and other persons appearing in the report. You should avoid reporting on sensitive personal information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership and data concerning health or sexual orientation not relevant for the case. Subject to other requirements under local law, the collected personal information will be deleted:

- immediately if the report is beyond the scope of the whistleblower policy or should prove unfounded or if no internal action is made in relation to the concern.
- right after the closing of the case by the authorities if a report is filed with the police or other relevant authorities.
- 2 months after the investigation has been completed if no further action is taken; or
- in accordance with our retention rules, if disciplinary sanctions are made towards the reported employee based on the collected information, or other reasons for it being factual and necessary to continue storing the information. The collected information will be stored in the personnel folder in question.

In general, please refer also to the Privacy Notice available within the whistleblower portal.

Deletion of Personal Data

Personal data processed through the DOVISTA whistleblower system are kept for as long as deemed necessary in the investigation of the case.

If the result of a concrete case presents no evidence of any irregularity, the personal data will be anonymised immediately or within two months of the case being closed at the latest.

If evidence of irregularities is found, various storage periods may apply dependent on further proceedings, including whether legal action or disciplinary steps are taken against the reported person or against the person who made the report if the report was made in bad faith.

Contact: info@dovista.com