

WHISTLEBLOWING POLICY

1.0 Introduction

- The term “whistleblower” refers to an employee who reports on an activity or activities which are, or they believe are, deemed illegal or otherwise unethical.
- This policy aims to provide such an employee with the support and protection they need to feel confident in speaking up. HUBER appreciates this can be an extremely difficult process for people to decide to go through and realise it is vital that they should feel able and confident to do so.

2.0 Protections

- Confidentiality: The employee’s identity will be protected whenever possible. Their identity would only have to be revealed, if an investigation or legal case were to result from the whistleblower’s report. In this case, revelation of identity would always be discussed with the whistleblower prior to it happening and all steps judged necessary would be taken to ensure the least possible repercussions.

Reports can also be made anonymously and in such cases all protections remain in place (it must be noted that reporting anonymously may make it more difficult for subsequent investigations to reach a conclusion).

- Retaliation: HUBER will not in any way retaliate against the whistleblower (“retaliation” is defined as termination of employment, detrimental change of contract or decrease in pay).

This does not mean, however, that the employee is immune from any charges of wrongdoing which may result from subsequent investigation or elsewhere.

3.0 Limitations of Protections

- The information reported by the whistleblower must have been reported in good faith as a matter of public concern (or at least believed to have been a matter of public concern).
- A whistleblower cannot report actions done at their own prerogative, though an individual can report matters they have been required to do by their line manager or superior.

- The matter should always be first reported to an immediate superior, the HR department, or management, if necessary. The only exception to this rule is if the whistleblower believes any one of the above are already aware of, and/or potentially complicit in, the matter concerned.

4.0 Investigation

- HUBER will always ensure any reporting by a whistleblower, anonymous or not, will be given full attention and thoroughly investigated.
- Though all internal investigations will be conducted judiciously and as fairly as possible, we appreciate there may be circumstances where it becomes apparent that an external investigator is needed. In such cases, we will ensure an individual of sufficient repute and experience is hired as soon as the need becomes apparent.

Rheinbrohl, January 2023

A handwritten signature in blue ink, appearing to read 'M. Lauble'.

Markus Lauble
Managing Director

A handwritten signature in black ink, appearing to read 'Arno Geis'.

Arno Geis
Managing Director