

– FAQ –

Whistleblower system of the SHS Group

1. Why should I turn whistleblower?

Your whistleblowing will help us detect irregularities early on, enabling the SHS Group to take action before any damage occurs, if at all possible. You are thus contributing to the sustainable success of the SHS Group.

2. On which topics can I submit a report?

You can report all serious infringements of applicable laws, internal procedures or compliance guidelines. This includes the issues that are not exhaustively listed below.

- Human rights
- Bribery and corruption
- Anticompetitive agreements & agreements in violation of antitrust law
- Conflicts of interest
- Data protection
- IT security
- Protection of confidential information
- Behaviour indicating other offences such as fraud, breach of trust, embezzlement, theft, property damage
- Bookkeeping/financial reporting/accounting
- Money laundering and terrorist financing
- Product safety and conformity

You will find an explanation of the points in the document "Reporting topics"

3. Which topics is the whistleblower system not intended for?

The whistleblower system is not intended for:

- General complaints (dissatisfaction with operational processes, disagreements within departments, etc.)
- Customer service (product queries, complaints about defects, etc.)

- Emergencies (in an emergency, please contact the plant security or similar emergency call centres immediately)
- Minor violations of internal regulations (work errors).

4. Do I need to inform my supervisor before blowing the whistle?

The supervisor should principally be the employees' first person to contact for the purposes of an open communication culture. But if this route appears inadvisable to you, you can also contact the responsible trust center directly. As a business partner, you can contact the respective contact person in our company.

5. How can I blow the whistle?

You can rely on four reporting channels for this:

Sending by external mail	Sending by internal mail
SHS-Stahl-Holding-Saar GmbH & Co. KGaA Vertrauensstelle Compliance – Gebäude E22 Werkstrasse 1 66763 Dillingen/Saar	Vertrauensstelle Compliance – Gebäude E22
Electronically – by e-mail: Vertrauensstelle@stahl-holdng-saar.de	
Telephonically: +800 44693473 (Mon - Fri: 8 a.m. - 6 p.m. and by appointment)	
Personally: You can make an appointment at the stated telephone number.	

We recommend you to use the report template so that your report can be duly processed and investigated. You can also use it as an orientation aid in direct contacts (telephone, personal meeting).

If you do not wish to use the template, please make sure that you detail all the aspects mentioned in it when you make your report. It is recommended to assign a unique ID number to every report (select a combination of the submission date and any four additional characters, e.g. 2020-10-15_h49s). This will help you provide further information about an already reported issue (anonymously) in the future, or to make enquiries.

6. Do I incur costs if I contact the trust center by telephone?

The hotline of the trust center can be reached from the following countries, there are no costs for the caller:

- Belgium
- China
- Germany
- France
- Italy
- Malaysia
- The Netherlands
- Poland
- Sweden
- Switzerland
- Spain
- Czech Republic
- Turkey
- USA
- United Kingdom

7. How should I contact the trust center if I am in a country from which the hotline cannot be reached (see question 6)?

We recommend that people from countries from which the free hotline cannot be reached to contact the trust center by e-mail.

8. Which way of reporting offers the greatest possible anonymity?

If your report is not handwritten and then mailed to the responsible office without a return address, your identity will not be technically traceable. *Please make sure that you provide all the essential information on the circumstances in this case. This will be easier if you use the report template. You could fill it in on the PC, print it out, and send it to the trust center without return address.*

9. What happens once I have made my report?

Your report will be documented in accordance with the law by the trust center, that was specifically established for this purpose, and then processed, possibly with the involvement of other departments.

10. Will my identity and other information provided by me be disclosed to external bodies?

Your personal data will only be provided or disclosed to external bodies insofar as this is required by a legal structure, or serves the legitimate interest of a SHS Group company or external body. In all these cases, this disclosure needs to accord with data protection regulations.

11. Will my identity and other information provided by me be disclosed to the persons involved in the incident?

Your report will always be treated confidentially.

The persons concerned (e.g. persons mentioned in your report) must be informed of the processing of their personal data for data protection reasons. But if there is a significant risk that this disclosure could jeopardize the effective investigation of the issue, it can be postponed for as long as this risk applies.

The identity of the whistle-blower will only be disclosed after a weighing of legally protected rights, meaning that it will not be disclosed if the legitimate interest of the whistleblower prevails.

If the investigation leads to the institution of criminal proceedings, however, the accused is due a right of access to documents. In this context, the accused can also find out the name of the whistle-blower on the basis of statutory regulations.

12. Can I enter into a dialogue with the trust center after whistle-blowing?

Yes, you can always contact the trust center directly. If you have assigned an ID number to your initial report, stating it will facilitate a faster entry into the subject matter.

13. Can I demand information on the progress of the proceedings or result of my report?

Yes. You can contact the trust center with questions about the development of the case after the conclusion of the internal investigation.

14. Who can I turn to if I have a feeling that I am being targeted by reprisals?

To the trust center.

15. What can I do if I am unjustly accused of misconduct?

Contact the trust center. If the system is deliberately abused, the whistle-blower cannot invoke protection by the system. The whistle-blower's identity can be disclosed in this case to assert own legal claims against him or her.

16. How is it ensured that reports submitted per e-mail can only be read by the recipient (Vertrauensstelle@stahl-holding-saar.de)?

Generally, third parties – external or internal – do not have access to your mailbox, unless you have explicitly passed these rights to internal colleagues (sharing). For technical reasons it is necessary that few system administrators can access the central e-mail system “Exchange” (maintenance, fault clearance). However, this access and the rights are highly regulated technically and organizationally.

Access to individual mailboxes is generally prohibited. Approvals for access by special administrators require, among other things, the approval of the independent group data protection officer. Violations of the regulations are taken very seriously and are punished.

17. What can I do if I am not certain if my concern is an issue for the whistleblower system?

Contact the trust center in this regard. Your enquiry will be treated as confidentially as the report itself.