

Reporting template Whistleblower system of the SHS Group

If you wish to submit a report that indicates serious violations of laws or guidelines that have been or are being committed by members of the SHS Group or by third parties who have a business relationship with the companies of the SHS Group and who are or will be in business connection with them, please use the present template.

You can send the completed template either scanned by e-mail or by postal mail to the following addresses:

- **E-mail:** vertrauensstelle@stahl-holding-saar.de
- **Address:** SHS-Stahl-Holding-Saar GmbH & Co. KGaA
Vertrauensstelle Compliance - Gebäude E22
Werkstraße 1
66763 Dillingen / Saar

Reporting template

Please also note the following **data protection information** on pages 4 - 6.

The fields marked with * are mandatory.

1. Personal details (Do not fill in if you want to submit an anonymous report.)			
Last name	First name	E-mail	Other, preferred method of contact
2. In which country did the incident take place?			
3. When did the incident take place? *		4. Does the incident still continue? *	
5. For employees only			
5a) Have you informed your supervisor? *		5b) Is your supervisor involved in the incident?	
6. Have you - as an external third party - informed other people about the incident?			
7. Do you have any relevant information about the incident or can you name someone who might have such information?			
8. Would you like to warn us - whom we are not allowed/should not contact for clarification of the incident under any circumstances, in order not to endanger your anonymity?			

9. Description of the incident and the persons involved.

Data protection information as per GDPR section 13

This data protection information informs you about the processing of your personal data by SHS - Stahl-Holding-Saar GmbH & Co. KGaA in the whistle-blower system. According to section 4.1 of the GDPR (General Data Protection Regulation), your personal data include all information relating or relatable to you as a person, especially by reference to an identifier such as a name, or to an organization or personnel number enabling you to be identified.

Personal information and personal data

In the reporting attending the whistle-blower process, the trust centre collects and processes information (both in paper and digital form).

These data may include all the data that you have reported or that become known in the further processing of the case:

- Master data (name, private or business address, telephone number, gender, e-mail address)
- Contract data (employment type, pay scale, employment level, employment start/end)
- Organization data (job name, supervisor, location, management level).

Using our whistle-blower system does not oblige you to provide your personal data. But the provision of your personal data would enable us to ask further questions and investigate the reported incident more quickly. If you do not disclose any personal information to us, we may be forced to discontinue the investigation of the incident due to incomplete or faulty information.

Purposes of the data collection and processing

SHS - Stahl-Holding-Saar GmbH & Co. KGaA will only collect, process and use your personal data for dealing with reports of actual or possible crimes, administrative offences, and serious, persistent infringements of internal regulations insofar as there is a legal basis for this, with the objective of uncovering the misconduct of staff of the Saarland's steel industry (see <https://www.dillinger.de/d/de/corporate/dillinger/gruppe/index.shtml> and <https://www.saarstahl.de/saq/de/konzern/index.shtml>) and its business partners, and of containing and/or correcting the negative consequences of this misconduct for the SHS Group, its institutions, facilities and assets.

Please see below for the purposes including the legal basis:

- Contacting you if we have further questions after your report (e. g. on the subject of your concerns, time and duration of the incident, business unit, circumstances of you gaining knowledge of the incident, possible substantiating documents and proofs), GDPR sections 6.1.a & f
- Answering your general queries concerning the reported circumstances, GDPR sections 6.1.a, c & f
- Forwarding to suitable internal bodies for the investigation (e. g. company management, the group's internal auditing department, personnel, IT, legal and data protection departments), GDPR section 6.1.f
- Forwarding to the persons concerned to fulfil their right of access, GDPR section 6.1.f

- Forwarding to persons bound by professional secrecy (lawyers) or other third parties contractually bound to maintain confidentiality for the further investigation of the reported incident, and possible assertion of civil claims against the reported persons. Forwarding to law enforcement agencies for law enforcement purposes in case of criminally relevant acts by the reported persons, GDPR sections 6.1.c & f, Federal Data Protection Act section 28
- Prosecution of fraudulent reports, GDPR section 6.1.f

We will only process your personal data within the framework of the stated purposes and insofar as required for them

Consent

By sending your report, you are also consenting to SHS - Stahl-Holding-Saar GmbH Co. KGaA processing and storing the personal data provided by you therein for the purposes stated in this data protection declaration, including the purpose of investigating any incident reported by you. You further consent to the personal data also being processed over and beyond the conclusion of an investigation for as long as required for an appropriate evaluation of the incident with re-spect to the further proceedings.

You can withdraw your consent anytime with effect for the future. Please address your revocation to our data protection officers (see below).

Your data protection rights

Your data protection rights are enshrined in GDPR chapter III (sections 12 ff.). These regulations entitle you to access the personal data stored about you, and be informed of the purposes of their processing, their possible disclosure to other bodies, and the storage period.

To satisfy your right of access, you can also be provided with excerpts or copies. If data should be inaccurate or no longer required for the purposes they were collected for, you can demand their rectification, deletion, or a restriction of their processing.

If your particular situation provides reasons not to process your personal data, you can object to such processing insofar as it is based on a legitimate interest. In this case we will only process your data if there are compelling legitimate grounds for this.

Disclosure of your personal information

We will not forward your data to third parties as a matter of principle, and will only disclose them to third parties without your consent if we are required to do so by law or based on a court or authority decision. In individual cases, your personal data can be disclosed to law firms commissioned by us.

Controller of the processing of your personal data

The controller of the collection, processing and use of your personal data is SHS - Stahl-Holding-Saar GmbH & Co. KGaA, Werkstrasse 1, 66763 Dillingen/Saar, Germany.

The personnel data are stored and processed in the digital databases of the trust centre on the servers of SHS - Stahl-Holding-Saar GmbH & Co. KGaA. The concept and technical installation are designed to ensure that only a restricted group of specially authorized people are authorized to access them and that any other access or other gaining knowledge of the data is excluded in keeping with the state of the art and internal specifications.

Complaints about the processing of your personal data

If you have reservations or questions about the processing of your personal data and information, you have the right to lodge a complaint with a supervisory authority, in particular in the member state of your habitual residence, place of work or place of the alleged infringement. You can turn to the trust centre or your respectively responsible data protection officer as a first contact.

Data protection officer contact data:

Mr Philipp Paquet
Data Protection Officer
Bismarckstraße 57-59, 66333 Völklingen
Tel.: +49 6898 102124
Fax: +49 6898 104040
E-Mail: Philipp.Paquet@stahl-holding-saar.de

Storage period

The trust centre processes personal data for as long as their knowledge is required to meet statutory requirements, or for the purposes of the investigation, or for the possible subsequent application of measures under civil or criminal law to the persons involved. We base this on the statutory limitation periods under civil and criminal law in a case-by-case assessment. In addition to this we also store your personal data insofar as statutory retention periods apply in connection with a report. This can particularly play a role in circumstances of relevance under tax law where section 147 of the tax code requires a storage period of ten years for business letters including e-mails.