

– Reporting topics –

Whistle-blower system of the SHS Group

Please see below for a selection of reportable issues the whistle-blowing system is intended for.

Criminal or improper conduct

This can be the case in the following situations, for example:

- Theft or unauthorized taking of items owned by the company or others.
- Improper, non-compliant spending of company funds (e.g. the establishment of unregistered cash funds or accounts).
- Wilful destruction of company property.
- Unauthorized, because prohibited or not approved, use of company property.
- Forgery of documents such as invoices or contracts.
- Serious contraventions of environmental laws (e.g. deliberate or grossly negligent pollution of water or soil by unprofessional, illegal dumping of harmful substances or chemicals, environmentally incompatible disposal of electrical appliances, rubbish dumping).

Anticompetitive collusion & agreements contravening antitrust law

The following situations may qualify as violations:

- Improper agreements (directly or via third parties, e.g. suppliers/customers/agents) with competitors about prices, pricing elements, market, customer or territory shares, about orders, production volumes and quotas or strategies.
- Calls for boycott.
- Exploitation of a monopoly position.

Bribery, corruption, conflicts of interest

The following situations may qualify as violations:

- Undue influencing of business relationships or officials, e.g. by offering gifts or invitations.
- Acceptance of personal advantages (for oneself and/or third parties) as a consideration for the non-compliance with internal rules and processes, e.g. order placement in circumvention of a due tendering process.
- Preferring of friends and acquaintances in the placement of orders or selection of suppliers.
- Engagement in activities that are in conflict with the employee's actual job, e.g. for a business partner whose commissioning is in the hands of the employee.

Information security

- Use of programs/systems to eavesdrop on persons (surveillance/tracking software, cameras, etc.) or for data espionage. This can be the case when hacking tools are used to identify passwords or in the targeted scanning of IT systems for vulnerabilities.
- Use of IT systems for illegal, unlawful activities or activities that are not authorized by the company.
This can also include the use of company-owned equipment to access contents that have a pornographic, discriminating or criminal background, glorify violence or are liable to have an undesirable influence on the moral development of young people.
- Forwarding of confidential information to third parties (e.g. documents, passwords, company ID cards).
- Deliberate use of software that has not been properly licenced in a company environment.
- Sharing in social networks of contents about the company that have not been released by the corporate communications department.

Disclosure of business and trade secrets

This principally includes the surrender to unauthorized third parties of information of economic value that is either not public knowledge or not accessible to the public and has been confided to an employee as part of his or her job.

This typically includes information about the following, for example:

- Business strategies and other company data
- Production processes
- Inventions

Violations in the area of accountancy/financial reporting/balancing of accounts

These can be encountered in all aspects of accounting, e.g.:

- Misstatement of turnovers, finances, inventories, expenditures, investments, unlawful cash, booking or bank transactions.
- Establishment of slush funds for unlawful use in business transactions.

Money laundering and terrorist financing

- Deliberate and persistent ignoring of indications of money laundering.
- Acceptance of cash payments in business transactions.
- Refraining from investigations despite engaging in business transactions with high-risk partners or politically exposed persons who refuse to disclose their economic beneficiary.
- Acceptance of payments from third parties without verifiable attribution to the business partner.

Product safety and product conformity

- Deliberate creation of false or counterfeit certificates, application of incorrect labels.
- Not informing the corresponding bodies in the company and concealment from the customer despite clear indications of health and safety risks posed by a product.

Violation of human rights

The whistle-blowing system should only be used to report violations of human rights if their reporting by other available reporting channels (e.g. works council or personnel department) has failed.

Disregard for human rights can take the following forms, for example:

- Violence, harassment, discrimination or disadvantaging at the workplace
- Violation of national, social occupational health & safety standards
- Reliance on forced and child labour (e.g. by suppliers).