



## **Whistleblower Policy** 检举人政策

### **Scope**

#### 范围

The following rules and regulations apply to external whistleblowers and the employees of the entire Heimbach Group. The Heimbach Group comprises:

以下规则和条例适用于外部检举者和汉跋集团下列公司的员工：

Heimbach GmbH, Düren/Germany  
Heimbach Ibérica S.A.U., Burgos/Spain  
Heimbach UK Ltd., Manchester/United Kingdom  
Heimbach Switzerland AG, Olten/Switzerland  
Heimbach Fabrics (Suzhou) Co., Ltd., Suzhou/China  
Heimbach Specialities AG, Neu-Moresnet/Belgium  
Marathon Belting Ltd., Rochdale/United Kingdom  
Industrie Tessili Bresciane Srl, Merone/Italy

In order to improve legibility of the policy we dispense with a differentiation regarding gender neutral language. The relevant terms shall apply to both genders according to the principle of equal rights.

为了提高政策的可读性，我们免除了对中性语言的区分。根据平等权利原则，本规定适用于男女双方。

### **1. Purpose**

#### 目的

The company has passed a Code of Conduct pertaining to the Heimbach Group, which sets down the values and principles of the company. This Whistleblower Policy covers measures for handling reports of alleged offences against any contents of the Code of Conduct of a general, financial, operational nature or in terms of employment.

公司通过了与汉跋集团有关的行为准则，该准则规定了公司的价值观和原则。本检举政策涵盖了处理检举涉嫌违反一般、财务、业务或雇佣方面的行为准则的任何内容的措施。

A whistleblower is an informant who brings to the attention of the company important information relating to Heimbach. This concerns company-internal grievances such as corruption, human rights abuses, data misuse or general risks of which he becomes aware at his place of work or in other contexts.

检举人是向公司提供与汉跋有关的重要信息的线人。这涉及到公司内部的不满，如腐败、侵犯人权、数据滥用或他在工作场所或其他环境中意识到的一般风险。

## 2. „Whistleblower Representative“ 检举人代表

Within the framework of this Whistleblower Policy the CEO of the Heimbach Group nominates a “Whistleblower Representative”.

在本检举人政策的框架内，汉跋首席执行官提名了一名“检举人代表”。

Current representative:  
当前代表

Stefan Körfer  
Heimbach GmbH, phone: +49 2421 802-501, [stefan.koerfer@heimbach.com](mailto:stefan.koerfer@heimbach.com)

## 3. Reporting cases of suspicion 检举可疑事件

Each and every employee of the Heimbach Group or any external whistleblower can report a case of suspicion against the Code of Conduct to the representative. In order to ensure target-oriented processing the report must include the contact data of the reporting whistleblower. These contact data are treated as confidential by the representative and are not passed on. We work from the presumption that a whistleblower reports only serious cases of suspicion in good faith and that he is aware that this report may have severe consequences including dismissal of the employee or the accused who has violated the Code of Conduct. For this reason, we can only investigate cases of suspicion that are supported by concrete information and evidence.

汉跋集团的每一位员工或任何外部检举者都可以向代表检举涉嫌违反行为准则的案件。为了确保目标导向的处理过程，报告必须包含检举人的联系信息。这些联系信息将被视为机密资料，由代表接收而不外泄。我们基于这样的假设进行工作：检举者真诚地检举严重的可疑案件，并且他知道此报告可能会造成严重后果，包括解雇违反行为准则的员工或被指控者。因此，我们只能调查有具体信息和证据支持的可疑案件。

## 4. Acknowledgement of receipt 回执确认

The representative acknowledges in writing the receipt of the whistleblower’s report while protecting confidentiality.

代表以书面形式确认收到检举者的报告，同时保护机密性。

## **5. Notification of report**

### 报告通知

The representative notifies the CEO of the Heimbach Group of the report. Should the report concern a member of the Executive Board of the Heimbach Group the report is passed to the Chairman or Vice-Chairman of the Administrative Committee.

代表将该报告通知汉跋集团首席执行官。如果报告涉及汉跋集团执行董事会的成员，则将报告转交给行政委员会主席或副主席。

## **6. Assessment of report**

### 评估报告

The representative assesses the report immediately and carefully and seeks relevant information. Based on this information the representative decides which measures are appropriate and necessary. The representative may instigate closer investigation of the alleged violation. The accused shall be informed and questioned about the allegations at an appropriate time.

该代表立即仔细评估报告并寻求相关信息。代表根据这些信息确定适当和必要的措施。该代表可对涉嫌违规行为进行更深入的调查。应当在适当的时候将指控的情况告知被检举者，并询问被检举者。

## **7. Information concerning the status of processing**

### 有关处理状态的信息

Wherever possible the representative keeps the whistleblower as well as the accused up-to-date on developments regarding his report.

代表尽可能地使检举者和被检举者了解报告的最新动态。

## **8. Information about results**

### 有关结果的信息

The representative informs the CEO or the Chairman or Vice-Chairman of the Administrative Committee of the result and possible recommendations as well as the responses of the accused and, if applicable, the whistleblower.

代表将结果和可能的建议以及被检举者和检举者（如适用）的回应，告知首席执行官或行政委员会的主席或副主席。

## 9. Information to third parties

### 向第三方提供的信息

The representative, the whistleblower, the accused and all participating persons process the report, the existence of a possible investigation of the report, the existence of a possible investigation of the alleged violation and/or of the confidential result or the possible recommendations confidentially. No information must be passed on to internal or external third parties without the consent of the representative, unless the company is bound by law or mandatory provision.

代表，检举者，被检举者和所有参与处理该报告的人员，是否存在对该报告的调查，是否存在对所指控的违规和/或机密结果或可能的建议的机密调查。未经公司代表同意，不得将任何信息外泄给内部或外部第三方，除非公司受法律或强制性条款的约束。

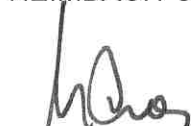
## 10. Exclusion of repercussions

### 排除影响

The whistleblower who has made a report according to this whistleblower policy must not suffer any repercussions in his employment.

根据检举人政策进行举报的检举者不得在工作中受到任何影响。

HEIMBACH GMBH

  
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Peter Michels  
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Werner Dilly  
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Dr. Ralf Kaldenhoff