



Whistleblower Policy

Heimbach Group

Scope

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

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

1. Purpose

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.

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.

2. Compliance-Organisation

The Compliance Committee is organisationally assigned to the Compliance division and is available to employees, business partners and third parties for advice on compliance-relevant issues. The committee consists of members of the Executive Board (Chairman: CEO), the Compliance Manager and Whistleblower-Representative, as well as the branch office managers for the provision of information. The Compliance Committee monitors compliance with and implementation of the Code of Conduct. Furthermore, it is responsible for the future-oriented adaptation of our rules and procedures within the framework of compliance management.

Heimbach has set up a whistleblower process which is assigned to the Compliance division. This offers all employees, business partners and third parties a protected space to report violations of the Code of Conduct or appropriately justified cases of suspicion while maintaining anonymity.

Information is received by the Executive Board, the Compliance Manager and Whistleblower-Representative or the Compliance Committee and treated in strict confidence.

Compliance Committee - confidential
Heimbach GmbH
An Gut Nazareth 73
52353 Düren
Germany
compliance@heimbach.com

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

Current representative:

Compliance Manager and Whistleblower-Representative

Stefan Körfer

+49 2421 802 501

stefan.koerfer@heimbach.com

In the event of violations to our Code of Conduct, the Compliance Committee conducts investigations in accordance with the information provided and determines specific actions and measures. If necessary, legal support is obtained to clarify the facts.

3. Reporting cases of suspicion

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 Compliance Committee 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.

4. Acknowledgement of receipt

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

5. Notification of report

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.

6. Assessment of report

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.

7. Information concerning the status of processing

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

8. Information about results

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.

9. Information to third parties

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.

10. Exclusion of repercussions

To the extent permitted by law, the identity of whistleblowers, accused persons and employees involved in the investigation of violations shall remain anonymous. The whistleblower must not suffer any consequences in his or her employment. Employees are prohibited from retaliating against whistleblowers.

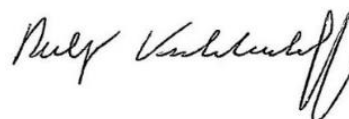
Heimbach GmbH

A handwritten signature in black ink, appearing to read "Marco Esper".

Marco Esper

A handwritten signature in black ink, appearing to read "Björn Bemelmans".

Björn Bemelmans

A handwritten signature in black ink, appearing to read "Dr. Ralf Kaldenhoff".

Dr. Ralf Kaldenhoff