

Whistleblowing Policy

Secure Connections



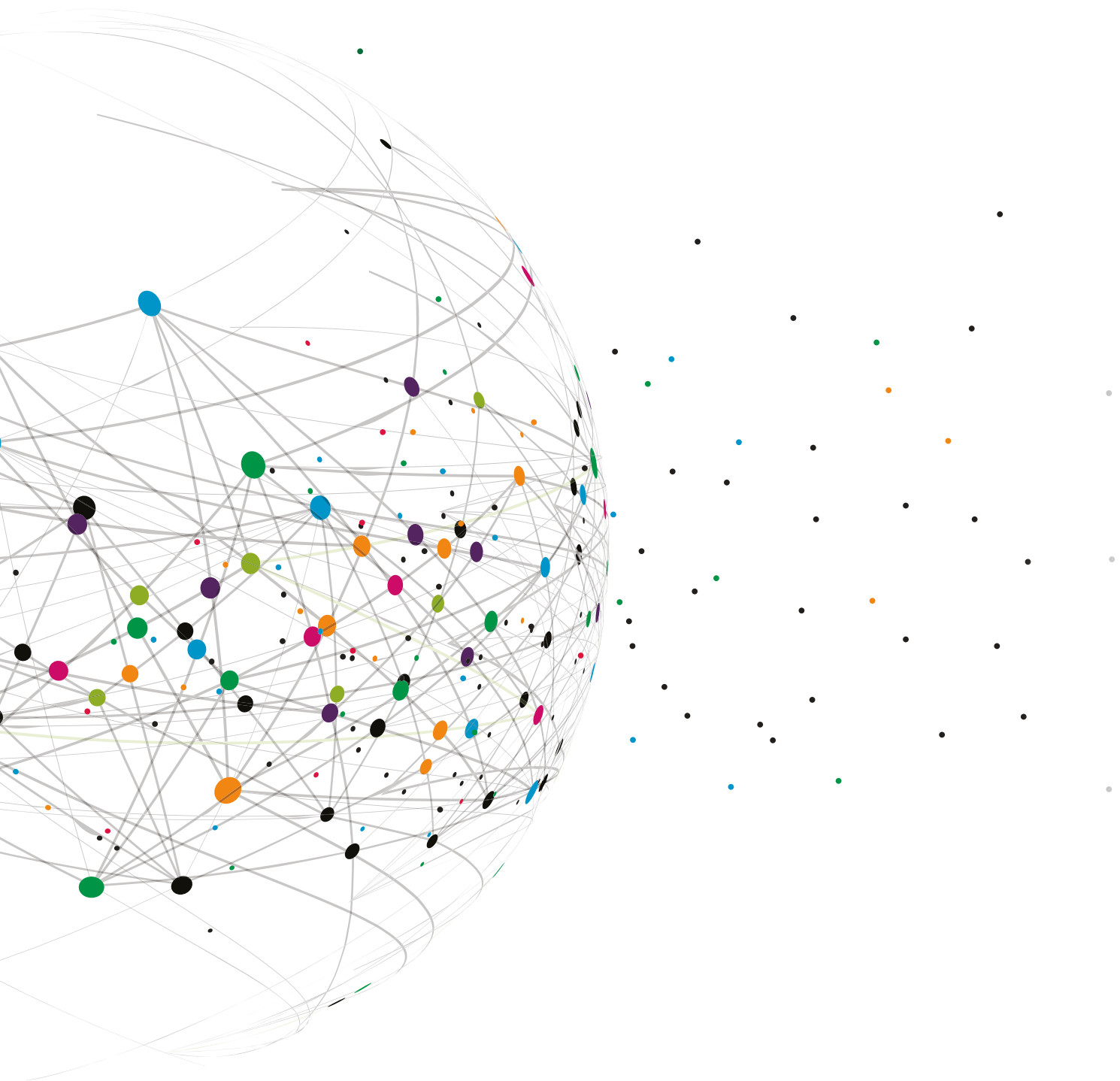


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1 Introduction

Dear reader,

There is a norm we live and work by at NORMA Group: to build 'secure' connections for every day of our working lives. As a leader in Joining Technology, secure connections are the foundation of everything we do. This fires our commitment for building and maintaining integrity, reliability, and transparency in our business practices.

We are determined to drive positive change. This is especially true for the way we conduct our business and the way we interact with each other and with people and companies outside NORMA Group. This is what Compliance at NORMA Group is all about – because secure connections are the fundamentals of our business.

The reputation of NORMA Group is a valuable asset that is critical to the success of the company. To safeguard it, we are committed to ensuring that our business processes meet the highest standards of integrity. We consider strong whistleblower procedures a key element of good corporate culture. We always strive to create an environment of trust and open communication that allows our employees to raise questions, ideas, and concerns.

With this in mind, we developed and implemented a system to help people address inappropriate behavior

in a climate of trust. It ensures that reports are taken seriously and that information submitted is treated confidentially.

As set out in our Code of Conduct, violations of the law or unethical behavior can damage NORMA Group's reputation and lead to severe legal consequences. It is the responsibility of all of us to prevent this from happening and to protect the reputation of our company in the market. We expect you to act honestly and fairly at all times. Illegal and unethical conduct is prohibited. Suspected cases will be investigated and may result in disciplinary and legal consequences.

If you become aware of illegal, unethical or dishonest activities or risks that jeopardize NORMA Group's business, this Whistleblowing Policy asks you to "speak up".

Maintal, May 2023



Compliance
Secure Connection

Dr. Gisa Ortwein,
Director Integrity

2 Scope & Purpose

This Whistleblowing Policy (the “Policy”) is applicable to NORMA Group SE and its direct and indirect subsidiaries (“NORMA Group”) and is available on NORMA Group’s intranet and website. It applies to all current or former employees, directors, and officers of NORMA Group as well as others with a connection to NORMA Group such as customers, contractors, suppliers, advisors, auditors etc.¹

Within the scope of this Policy, paid and unpaid work are equally considered. Therefore, this Policy also applies to persons performing their work on a voluntarily basis within NORMA Group or for any other company or organization related to NORMA Group. As a global company, NORMA Group operates in multiple countries and is subject to various applicable local laws.

If local laws are in any way inconsistent with this Policy or impose a higher level of protection, such local laws prevail. With this guideline NORMA Group informs you about the content requirements for reports, the channels

for reporting as well as the protection of Whistleblowers. This Policy illustrates in which manner NORMA Group will support and protect Whistleblowers against retaliation. It also describes how NORMA Group ensures the fair treatment of those who are named in reports.

However, this Policy cannot cover every situation you might encounter in your daily operations. Hence, NORMA Group encourages you to openly discuss Compliance issues. Often, asking a question is the best way to determine whether an action is improper and does not comply with applicable law.



¹ It also applies to a relative, dependent or dependent of the spouse of any of the aforementioned individuals.

3 Whistleblowing

Simply spoken, Whistleblowing is the process of reporting a perceived wrongdoing to a person with authority.

In this Policy, a Whistleblower is defined as:

- a person who reports,
- to one or more of the parties specified further on in this Policy,
- an activity that he or she considers to be
- illegal, dishonest, unethical or otherwise improper.

3.1. WHAT CAN BE REPORTED?

Reportable conduct entitling to protection under this Policy ("Reportable Conduct") includes concerns about suspected or actual

- prohibited conduct according to the EU Directive 2019/1937 on Whistleblower Protection or its local transposition laws, especially **illegal conduct** including but not limited to fraud, corruption, bribery, violations of anti-trust law, embezzlement or money-laundering,
- **conduct damaging NORMA Group's assets or interests,**
- **conduct that violates NORMA Group policies** (e.g. NORMA Group Code of Conduct, Anti-Corruption Policy, Supplier Code of Conduct).²

For the avoidance of doubt, Reportable Conduct does not include "personal work-related complaints". These are complaints

- relating to the current or a previous employment relationship of an employee³ and
- that are personally related to that person and have no wider implications for NORMA Group.

For example, an interpersonal conflict between employees, or a decision relating to employment or engagement, such as a transfer, promotion or disciplinary action of an employee.

Additionally, please note that Whistleblower protection under this Policy does not apply to false notifications given in bad faith. It is the goal of this Policy to protect individuals who report Reportable Conduct based on comprehensible facts and in good faith. Every report given in good faith entitles to protection under this Policy.

² According to Australian Law, it does also include misconduct or an improper state of affairs in relation to a group company or danger to the public or financial system.

³ Or a relative or dependent who is an employee.

3.2. WHO TO REPORT TO?



3.2.1. Confidential Reporting to NORMA Group Compliance

If you become aware of or reasonably suspect any Reportable Conduct, please submit reports to NORMA Group's Compliance Officers. The contact details can be found in section 6. You can also use the following email contact:



compliance@normagroup.com

Any question relating to this Policy or other policies can be addressed to NORMA Group Compliance or your local Compliance Delegates at any time.

We encourage you to share your identity when making a report as it will make it easier for us to address your report. Of course, this information will be kept strictly confidential.

3.2.2. ANONYMOUS REPORTING VIA BKMS® WHISTLEBLOWER SYSTEM

When submitting your report, you do not necessarily have to identify yourself or your role within NORMA Group. You can choose to do so anonymously. In these cases, NORMA Group asks you to report the alleged misconduct using the **BKMS® Whistleblower System**. It can be accessed via:



<https://www.bkms-system.net/normagroup>

NORMA Group provides the BKMS® System to its employees, customers, suppliers, and stakeholders as means of reporting Reportable Conduct. In this way, it also functions as an external channel enabling persons outside from NORMA Group to submit a report either by name or anonymously.

With the BKMS® System, NORMA Group aims to effectively protect Whistleblowers. The system represents a communication platform secured with the latest technologies. It also enables the submission of anonymous reports. The utmost principle of the BKMS® System is to protect the Whistleblower's identity. The functionality of anonymity protection is certified and

can be checked at any time of the process. Encryption and other special security methods ensure that reports remain anonymous. The BKMS® System offers the possibility to set up a secured postbox. By setting up a postbox, NORMA Group Compliance can regularly inform the reporter of the processing status of the report. In addition, questions can be answered via this postbox and the reporter can actively support the investigation of the facts. The reporter's anonymity is not affected by setting up a postbox.

Only members of NORMA Group's Internal Reporting Office have access to incoming reports. They can contact the whistleblower via the secured postbox to provide information or to ask further clarifying questions. This enables communication while staying anonymous.



3.2.3. OTHER REPORTING CHANNELS



While it is NORMA Group's preference that reports are raised with the contacts mentioned in sections 3.2.1 and 3.2.2 above, it is important to note that according to some national laws, Reportable Conduct can also be communicated to defined other members of the respective NORMA Group Entity.⁴

Within the European Union, it is possible to report reportable conduct either internally via the reporting channels mentioned above or externally to the respective local competent authorities.⁵

NORMA Group encourages all employees to submit reports to the internal reporting channels mentioned above to ensure that their reports are addressed as quickly as possible, and any breaches can be rectified without delay.

Please note that the channels of internal communication are secure and lead to Whistleblower protection under the conditions set forth in this Policy, while external communications must comply with legal requirements and a violation of these requirements may result in significant negative consequences.

Please also note that NORMA Group is committed to grant the full Whistleblower protection according to the European Directive although the European Directive⁶ itself has not come to force in all Member States yet (as it needs to be incorporated into national law by each of the European Member States).

⁴ Depending on the applicable law, these may be members of the Company who make or are involved in decisions that affect all or a significant portion of the Company's operations, or who have the ability to significantly affect the Company's financial position. Please refer to <http://www.normagroup.com/corp/en/Compliance/Whistleblowerprotection/locallegislation>.

⁵ Please also refer to <http://www.normagroup.com/corp/en/Compliance/Whistleblowerprotection/locallegislation>.

⁶ The Directive can be accessed in all EU-languages under <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32019L1937>

3.3. HOW TO REPORT?

It's up to you in which way you would like to present your concern – any form of approach as described under 3.2 is acceptable under this Policy. Please note, however, that you can only receive an acknowledgement of receipt or information, e.g. regarding possible investigation results of the reported facts, if you choose one of the following reporting channels:⁷



E-Mail to NORMA Group Compliance
(compliance@normagroup.com)



BKMS® Whistleblower System

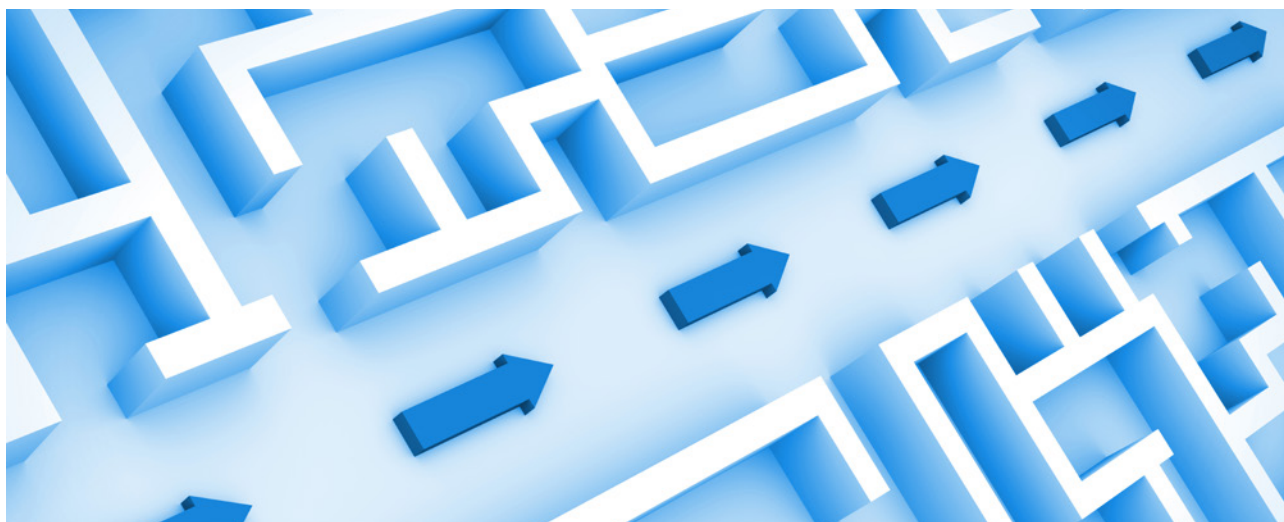
Either way, NORMA Group asks that you **express your concern as early as possible**, as detecting deficiencies early on might prevent (financial) damages and in general makes it easier to address the situation.

At your request, a personal meeting with a member of the Compliance team at group level or your local Compliance Delegate can be arranged within seven days after such request.

When submitting your report you are asked to provide the following information:

- The **nature** of your concern;
- the **substance** of your allegation (evidence as available); and
- **details** regarding the background and history of your concern.

While you are not expected to prove beyond doubt the truthfulness of your suspicion, you will need to demonstrate that you are acting in **good faith**. This means that you have a genuine concern of alleged malpractice by or within NORMA Group and that there are reasonable grounds for your concern.



⁷ Unless local legislation provides for an additional local reporting channel, through which appropriate feedback/communication is in principle possible. Please note <http://www.normagroup.com/corp/en/Compliance/Whistleblowerprotection/locallegislation>.

4 Protection of Whistleblowers

NORMA Group recognizes that internal reporting is critical to uncovering misconduct and preventing financial loss and damage to NORMA Group's reputation. Therefore, a report made in good faith will not result in any disadvantage for the person making the report.



4.1. LEGAL RIGHTS

To encourage Whistleblowers to speak up and report their concerns, the law of various countries grants Whistleblowers certain legal rights and protections. This Policy takes into account applicable law such as the Australian Corporations Act 2001 (Cth) and European Union law that protect persons who report or disclose certain matters. This requires that the reports be made in accordance with the law and, most importantly, in good faith.

4.2. PROTECTION AGAINST RETALIATION

NORMA Group is aware that the decision to report may cause anxiety. At the same time, you should not have anything to fear, if you are convinced of the truth of your concern. Therefore, NORMA Group protects Whistleblowers acting in good faith against detriment, dismissal, demotion, and other forms of retaliation.

NORMA Group assures that no labor, disciplinary, criminal or civil sanctions are being imposed upon Whistleblowers and that they are protected from disadvantages. NORMA Group does not tolerate any form of harassment of Whistleblowers and will take appropriate action to protect them.

Discriminatory behavior towards Whistleblowers is strictly prohibited and will be consistently sanctioned by NORMA Group through disciplinary action.

NORMA Group encourages all persons being subject to this Policy to report any act of or suspicion for retaliating action as a result of making a report under this Policy as described under section 3.

4.3. SUPPORT DURING THE PROCESS

NORMA Group is committed to supporting Whistleblowers throughout the investigation process. They will receive support from NORMA Group's Compliance Organization.

For example, a Whistleblower can be transferred to another workplace for the duration of an investigation in order to be protected. Whistleblowers who are not NORMA Group employees also receive appropriate advice and support.

4.4. CONFIDENTIALITY

The identity of the Whistleblower will be kept confidential. The same applies to the identity of the person(s) concerned or other person(s) mentioned in the report. Their identity may only become known to the persons responsible for receiving reports or taking follow-up measures. NORMA Group will only reveal the identity of a Whistleblower or information that could identify a Whistleblower to third parties if

- the consent of the Whistleblower has been given
- it is permitted by law (e.g. in the context of consultation with lawyers) or
- if authorities or courts demand the disclosure of certain information; the Whistleblower will be informed in advance of the disclosure of his or her identity unless the respective authority or court has informed NORMA Group that the information would jeopardize the relevant investigations, enquiries, or court proceedings.

If you have chosen to remain anonymous, your anonymity will be protected during the process. Within the BKMS® Whistleblower System, your anonymity is protected by a certified technical solution, provided that you do not enter

any data that reveals your identity. At no time during the reporting process will you be asked for personal information. NORMA Group is aware that during the investigation of a report it may happen that information is disclosed which could lead to the identification of the Whistleblower. Nevertheless, NORMA Group will take all legally feasible precautions and reasonable steps to mitigate this risk. If an investigation leads to the initiation of disciplinary or other proceedings, you may be asked to testify as a witness. If you agree to be called as a witness, you will be given the maximum level of protection, support and advice.⁸



4.5. FALSE REPORTS



If you make a report reasonably believing it to be true, whereas the investigation comes to a different conclusion, NORMA Group will acknowledge your concern and you will have no reason to fear any action taken against you.

However, if you make an allegation frivolously, maliciously or for personal gain, knowingly wrongly accusing somebody else of misbehavior, NORMA Group will undertake appropriate disciplinary measures or may even consider taking legal action.

⁸ Please note that, under the law of many countries, you will have to testify in front of authorities and courts even if you do not consent. This requires that the authorities and courts know your identity and connection to a Reported Conduct. Therefore, NORMA Group takes the above-mentioned measures of confidentiality serious and encourages you to use the BKMS® Whistleblower System if you feel unsure about revealing your identity.

5 Handling of Reports

5.1. RECEIVING REPORTS

In principle, all reports submitted via NORMA Group's BKMS Whistleblower System or to the e-mail contact compliance@normagroup.com, will be sent to NORMA Group Compliance. If you make your report inadvertently to non-competent personnel, your report will also be forwarded to Norma Group Compliance.

5.2. PROCESSING OF REPORTS

All reports submitted under this Policy will be taken seriously and analyzed by NORMA Group's Compliance Officers/Delegates. They will decide whether the allegations raised should be investigated. If you submit a report, you will receive a confirmation of receipt by NORMA Group's Compliance Organization within seven days. This is only not the case if you submit a message anonymously without setting up a secured postbox.



E-Mail to NORMA Group Compliance
(compliance@normagroup.com)



BKMS® Whistleblower System⁹

Each Whistleblower report is evaluated and a decision is made on how to proceed. Not every Whistleblower report necessarily leads to an investigation.

The raised concerns may lead to:

- an investigation headed by NORMA Group's Compliance Organization or one of its members.
- an internal audit;
- an independent investigation conducted by a third party; or
- referral to local authorities, e.g. to the police.

If you submit your report via the above-mentioned reporting channels, NORMA Group's Compliance Organization will provide you with feedback on the actions taken as a result of the report, in principle within three months. Such statement may also have the content that investigations did not lead to any evidence regarding the reported concern and that investigations, therefore, have been stopped.

All actions will be taken in an objective and fair manner and appropriately in light of the nature of the reported conduct.

If you choose to submit your report directly to NORMA Group's Compliance Officers or (anonymously) via the BKMS® System, you will receive an acknowledgement of receipt. In addition, NORMA Group Compliance may also communicate with you in these cases. If you choose to use the BKMS® System, communication is even possible if you remain anonymous (provided you set up a postbox).

The possibility to communicate and clarify questions about the content of a report is important for analyzing a situation.¹⁰

If you decide to submit a report anonymously or without a postbox in the BKMS® System, this analysis can only be performed based on the information provided in the report.

If NORMA Group's Compliance Officers decide to investigate the report, the accused person will be informed of the ongoing process at a specific point in time. He or she has the opportunity to respond to the allegations made. This serves to ensure fair treatment of those mentioned in the reports.

NORMA Group assures that, regarding this Policy, personal data will be collected, used, stored, transferred, and otherwise processed with the greatest care and in accordance with applicable data protection regulations.

⁹ In order to receive a confirmation of receipt it is necessary to set up a postbox.

¹⁰ Furthermore, in countries where local legislation provides for an additional local reporting channel, feedback/communication is also possible in principle. Please note <http://www.normagroup.com/corp/en/Compliance/Whistleblowerprotection/locallegislation>.

6 Contact

Reports may be submitted to



NORMA Group Compliance
compliance@normagroup.com



BKMS NORMA Group
Whistleblower System for reporting
- mai <https://www.bkms-system.net/normagroup>

Director Integrity

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7 Review

This Whistleblowing Policy is subject to regular review by NORMA Group Compliance and can be amended due to changes in applicable law or in NORMA Group's business. It is therefore necessary to make sure that you rely on the up-to date version which can be accessed under:

<https://www.normagroup.com/Compliance>







