

SYSTEM FOR INFORMERS

For our customers, suppliers and business partners

We, the Uelzena eG, have committed ourselves to complying with legal regulations, corporate rules and our Code of Conduct. This also includes the strengthening of the relationship of trust between us, the Uelzena eG, and our employees, customers, suppliers and business partners. Our whistleblower system was set up to allow you to let us know about any violation of legal regulations and/or compliance rules and thus to contribute to their detection.

Based on this as a background and in order to limit any damage as early as possible for us, our employees, customers, suppliers and business partners, the Uelzena eG within the scope of its compliance management has set up reliable information channels for internal and external informants.

Employees of Uelzena eG can report possible misbehavior or information on incorrect business practices through an internally published reporting channel in a safe and confidential way. Customers, suppliers, business partners and other external stakeholders also have the opportunity of reporting irregularities and suspect cases, confidentially and safely.

We have appointed an internal Compliance Officer who can be approached by employees and business partners free of charge. The Compliance Officer is obliged to treat any information in a strictly confidential manner. The Management Board and the Supervisory Board give assurances of protecting informers from any kind of interference.

As an external informer, you are free to decide on whether you provide your name and contact data and also on how and in which way the Compliance Officer passes on your information to the responsible bodies within Uelzena eG.

If you have substantiated knowledge of serious legal infringements or violations of rules at Uelzena eG or if you suspect these, you have the opportunity of contacting the relevant Compliance Officer at Uelzena eG.

Contact details for the Compliance Officer

Mr. Christoph Bonmann

Managing Director Finances and Human Resources, Uelzena eG

Email: compliance@uelzena.de

Inquiry Form

Please fill in this form if you want to report a specific conflicting incident where the Compliance Officer may be of help in an advisory and/or mediating role based on the existing information regarding a violation of anti-corruption and anti-trust laws, breach of trust, theft, violation of accounting and bookkeeping rules and/or irregularities that may result in high monetary losses or the damaged reputation of the Uelzena eG.

You can also send informal inquiries by email to compliance@uelzena.de

Your information is used to speed up the processing of your inquiry and will be treated confidentially. Forms that are not completely filled in will also be considered.

Your information on a possible violation of the above stated issues shall contain the following:

- 1) Inquiry Form: There is no necessity to fill in all fields; however, you should take into consideration that we might want to contact you as the informant in the case of further confidential inquiries.
- 2) Evidence: Please include proof to substantiate your description (e.g. files in question, manually documented facts, relevant emails, etc.). If you have a lot of documents, please only send in the most relevant.

You can issue your inquiry by email.

Contact:

Mr. Christoph Bonmann

Managing Director Finances and Human Resources, Uelzena eG

Email: compliance@uelzena.de

1) Information on informant:

Title, name, first name (Alias will be accepted)	
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Further contact information (private or business; should be included even when using an alias to enable further inquiries)

Postal address	
Phone	
Email	

Date of possible violation	
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Department		
Possible violation	Offence of anti-corruption and anti-trust laws	<input type="checkbox"/>
	Breach of trust	<input type="checkbox"/>
	Theft	<input type="checkbox"/>
	Violation of accounting and bookkeeping rules	<input type="checkbox"/>
	Irregularities that may result in high monetary losses or damaged reputation	<input type="checkbox"/>
	Others	

2) Additional information

About you as the informant and/or about the counterpart

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3) Your information

Did you disclose your information to other supervisors, managers or third parties for investigation?	No	<input type="checkbox"/>
	Yes, to:	
Time/period of the described incident		

4) Description of the incident

Please explain the possible violations. Alternatively, you can also explain the issue in a separate document.

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5) General information on the procedure

What will happen with the inquiry or information?

First of all, the Compliance Officer will assess the information:

- If it is a consulting issue that can be answered immediately, then an answer will be arranged through the communication channel that you chose;
- and/or if the information points to possible wrongdoing, weaknesses or possible improvements that need to be looked at more closely within the Uelzena eG.

Should I expect further investigations because of my inquiry or information?

You as the informant have to expect further investigations based on the information or the concrete case. This applies to information on wrongdoing, weaknesses or possible improvements, and even for consulting inquiries that contain such information. Otherwise, your information would be rendered inadequate. The Compliance Officer and Uelzena are obliged to follow up all alleged violations in an appropriate manner.

If you provide more information on the incident or attach documents to your information, please be aware that these may lead to the complete disclosure of your identity.

Will the employees concerned, supervisors or managers be informed about the inquiry or the information?

Yes, in the interests of complete fairness and because we are honest with each other. However, this does not apply if the information may result in the risk of collusion or if it is expected that other employees will be put under pressure or discriminated against.

Will third parties including investigating authorities, the labor inspectorate, public prosecutors or anti-trust authorities be given access to my inquiry or information or will they learn about the result of further investigations?

Yes, third parties including investigating authorities, the labor inspectorate, public prosecutors and anti-trust authorities will be given access to the inquiry or specific information and the results of further investigations. This means that official authorities within the scope of their investigatory powers have access to all information that is available in the company. For example, prosecutors or anti-trust authorities may request, within the scope of their investigations and based on a court order that all documents and papers shall be submitted that are linked to a certain incident in the company. They are also authorized to conduct searches.

Uelzena may avoid the issuing of such confiscation orders or search warrants by submission of the respective documents. This includes the information in this inquiry form regarding a certain issue on which information is available and stored by the investigating authorities.

What happens if my inquiry or information is related to an issue where I myself violated rules or did not act in accordance with the law?

If your inquiry or information leads to uncovering a serious breach of the rules by yourself, then this does not protect you from appropriate measures related to the labor law or even consequences under criminal law.

In principle, we would like to point out that all inquiries sent to the Compliance Officer are subject to strict confidentiality.

This serves as protection of all persons involved and applies to the contents of an inquiry as well as to the circumstances and further investigations that may possibly be initiated.

We would also like to point out to all informants that they should maintain the required confidentiality during the process and even after the subject has been closed in order to ensure that processing is as unburdened as possible.

Uelzen, June 2017

Signed by C. Bonmann

Compliance Officer of the Uelzena eG