

# RULES OF PROCEDURE FOR BOMAG 'S WHISTLEBLOWER SYSTEM

## I. Introduction

These Rules of Procedure explain the process of submitting and handling incoming reports. It describes the channels through which reports can be submitted, the respective responsibilities and working steps for processing reports upon receipt as well as the measures taken to ensure whistleblower protection. The whistleblowing system aims to offer whistleblowers simple and secure contact channels, enabling the early identification of risks, misconduct, and violations, and facilitating the swift resolution of any violations.

## II. Addressees and scope of application

Through the BOMAG whistleblower channel, BOMAG employees, business partners, customers as well as third parties can securely report violations occurring within the companies of the BOMAG Group.

In its scope of application, the BOMAG whistleblower channel extends to information on legal positions protected by the German Supply Chain Due Diligence Act as well as information within the scope of application of the German Whistleblower Protection Act or other national regulations implementing the EU Whistleblower Directive.

Violations can be reported if committed by:

- Employees (including directors and officers) of the BOMAG Group in the course of their work for BOMAG;
- suppliers and service providers in BOMAG's supply chain.

## III. Procedure

Regardless of the reporting channel used, the procedure is uniform from receipt of a report.

### 1. Responsibilities

The reception and handling of reports are the responsibility of dedicated case managers who act impartially, are bound to confidentiality, and are not subject to instructions within the investigation process.

### 2. Submission of a report

Whistleblowers have various reporting channels available:

- An internet-based reporting portal that can be accessed in several languages via the following link: [Complaint management \(osapiens.cloud\)](https://osapiens.cloud).

If a report is submitted via the online portal, whistleblowers are able to track the processing status of a report.

- Postal notices can be sent to the following address:

FAYAT Bomag GmbH & Co. Unternehmensführung KG  
Compliance  
Hellerwald  
56154 Boppard  
Germany

Information can be submitted confidentially and/or anonymously.

- Phone: The responsible department can also be reached via the following phone number: +49 6742 100 9271

- E-Mail: Reports may also be submitted to the following e-mail address: [compliance@bomag.com](mailto:compliance@bomag.com).
- Personal Meeting: Whistleblowers may also use the contact information above to schedule a personal appointment with the responsible department.

### *3. Receipt of a report*

Upon receipt of a report the whistleblower will receive a conformation of receipt. This confirmation is usually sent immediately, however, in some cases, it may be delayed by up to 7 days.

### *4. Processing of reports*

Upon receipt of a report, it is centrally reviewed and assigned to a dedicated case manager within the responsible department. This person maintains contact with the whistleblower, examines the case details, and, if necessary, discusses them with the whistleblower. If a relevant violation or risk is confirmed, appropriate measures are initiated by the case manager, who might also involve other corporate departments where appropriate. Reports are also considered as part of the risk analysis in accordance with the Supply Chain Due Diligence Act. The results of the review are communicated to the whistleblower, and if necessary, further steps are discussed with them.

Reports are usually processed within three months of their receipt. During this period, whistleblowers receive at least one interim report on the processing status.

### *5. Anonymous submission of a report*

The anonymous submission of information is generally possible. If information is submitted anonymously, no data will be collected that would allow conclusions to be drawn about the identity of the whistleblower. If the whistleblower provides information that allows conclusions to be drawn about their identity when submitting a report anonymously, this information will be treated confidentially.

Whistleblowers are legally protected if, at the time of the report, they have reasonable grounds to believe that the information they are reporting is accurate. Deliberate false reports are therefore excluded from whistleblower protection and may result in liability for damages for the whistleblower.

### *6. Confidential submission of a report*

In addition, the confidentiality of personal data and other information that allows conclusions to be drawn about the identity of the whistleblower is ensured. Only the responsible case manager and the person responsible for allocating the information can view a report.

### *7. Documentation of reports*

Reports are stored in accordance with the relevant legal requirements.