

RUBIX

WHISTLEBLOWER SYSTEM

February 2024



1. Our whistleblower system

At Rubix, we endeavour to create a transparent and ethical working environment in which integrity and responsibility are paramount. These principles are set out in writing in our [Code of Conduct](#), which is constantly updated and followed.

As a further part of this commitment, we have introduced a whistleblower protection system that enables our employees, customers, suppliers and other partners to report grievances such as corruption, fraud, environmental pollution, product safety or violations of labour and social standards without having to fear negative consequences.

The report can relate to grievances from the direct area of our company and our subsidiaries, but also from those of our customers, suppliers and other business partners.

2. Violations

In principle, all violations or suspected violations of applicable law and other regulations can be reported by anyone. However, if rights are asserted on behalf of another person (e.g. remedial measures under the Supply Chain Due Diligence Act), we request that a power of attorney be provided.

In particular, grievances can be reported in the following areas:

- Violations of applicable law and standards of behaviour at national and international level
- The offences specified in Section 2 (2) of the Whistleblower Protection Act
- Violations of internal company regulations (such as the Code of Conduct)
- Attributable violations of human rights and environmental obligations under the German Supply Chain Due Diligence Act (LkSG).
- Other abusive behaviour



3. Compiants procedure

E-mail reporting channel

We therefore encourage anyone who would like to report misconduct to contact us at compliance.de@rubix.com. It is not important to us that the identity of the whistleblower is disclosed and anonymous reports are expressly welcome (e.g. by using so-called "disposable e-mail addresses"). If the identity of the whistleblower is disclosed by the whistleblower, this will of course be treated in strict confidence.

Third-party provider

With Safecall as a provider of an independent and secure reporting channel, we have found an independent partner in addition to our internal reporting system to also be able to receive such reports. This also makes it easier for reports to be made anonymously. Safecall is available to you on **00 800 7233 2255** or online at <https://www.safecall.co.uk/report>.

Postal service/In person

In addition, you can of course also submit reports by post or in person. Please use the following postal address:

Rubix GmbH
Dept.: Compliance
Scheiblerstrasse 3
94447 Plattling

If you wish to submit a report in person, please make an appointment in advance by sending an e-mail to compliance.de@rubix.com.

External reporting office

We encourage the reporting of misconduct via the reporting channels described above. However, based on the EU Whistleblowing Directive and the German Whistleblower Protection Act based on it, EU member states are required to define authorities that also accept reports of misconduct as external reporting channels. In Germany, this is the Federal Office of Justice (BfJ - Whistleblowing Centre (<https://www.bundesjustizamt.de>)).

You are of course free to call this external reporting channel, but we cannot guarantee the principles on which we have based this. We have no influence on these investigations and cannot guarantee that your request will be prioritised.

4. This is how we process a report

Procedure

All reports of potentially relevant violations are thoroughly checked by expert staff. Whether they are reported to us directly or referred by our partner Safecall is not the decisive factor. However, we would like to point out that Safecall only receives the report and does not carry out any assessment itself.

If the report gives rise to a justified initial suspicion, a corresponding investigation will be initiated. The results of this investigation will then be communicated to the decision-makers of our company with recommendations for sanctions, if necessary. The investigation itself is conducted in accordance with recognised procedural principles. The right to a fair trial, the presumption of innocence and proportionality are upheld. However, it is also important to emphasise that confidentiality is a strict procedural principle.

If you have provided us with your contact details as the person providing the information, you will also be informed of the processing status and the outcome of the investigation.

You can find more detailed information in our privacy policy.

Provision of information

In the following, we would like to inform you which information may be important for us during the initial processing. However, we would also like to clarify that mentioning the following points should not be a criterion for excluding us from processing a complaint. As already mentioned, we investigate every complaint appropriately, regardless of its form and detail. In this way, however, we can ensure a speedier assessment and processing of the matter.

- Description of the facts in chronological order (when did what happen where and who were the people involved)
- Possible responsibilities regarding the violation
- Which law or regulation (also internal) has been violated
- If evidence (photos, witnesses, documents, etc.) is available
- How and whether you would like to be contacted as a notifier

We firmly believe that whistleblowers play an important role in strengthening our integrity as a company. Their voice is important and is heard. Together, we can help create a culture of transparency and accountability and thank all whistleblowers for their contribution.