

## **CHIRON Group SE**

### **Rules of Procedure for the Complaint Procedure pursuant to § 12 et seq. Whistleblower Protection Act (HinSchG)**

#### **I. Introduction**

In accordance with the Whistleblower Protection Act (HinSchG), CHIRON Group SE is committed to the protection of persons who have obtained information about violations in certain areas of law and report these to the designated reporting offices ("whistleblower"). Likewise, CHIRON Group SE is committed to protecting the persons who are the subject of a report as well as other persons who are affected by a report within the meaning of the HinSchG.

Therefore, CHIRON Group SE provides various reporting channels and has set up an internal reporting office to receive and process incoming tips.

These rules of procedure explain the process of submitting and processing incoming tips. It sets out how the complaints procedure can be accessed, who is responsible for the complaints procedure, what the specific process is from the receipt of a complaint and what measures are taken to protect the whistleblower and other protected persons.

#### **II. Addressees and scope of application of the complaint procedure**

The complaint procedure is open to the public and is available to all persons who have become aware of certain violations of the law in connection with their professional activity or in the events preceding such activity. The aim of the law is to enable such persons to provide information without having to fear that they will become victims of reprisals. The material scope of application of the legal violations covered by the HinSchG includes, in particular, violations that are punishable by law (e.g., theft, fraud, betrayal of trade secrets) and violations in certain areas of law, such as money laundering, financing of terrorism, competition and antitrust law, corruption, product safety or data protection, but also other areas of law.

#### **II. Procedure**

Regardless of the reporting channel used to submit a report, the procedure is uniform from the time the report is received, unless otherwise specified in these Rules of Procedure.

## 1. Responsibility for the complaints procedure

Only employees who act impartially, are sworn to secrecy and whose independence is guaranteed within the framework of the complaints procedure are responsible for receiving and processing information. Precautions are taken to avoid conflicts of interest.

## 2. Submission of a tip

In principle, different reporting channels are available to whistleblowers:

- An Internet-based reporting portal, which can be accessed in multiple languages via the following link: [Link to reporting portal](#)
- CHIRON Group SE, c/o Legal Department, Keyword: Complaint Procedure, Kreuzstrasse 75, 78532 Tuttlingen, Germany.
- Telephone tips can be reported during the period from Monday to Friday (09:00 to 17:00 CET) by calling +49(0)74619400.
- Notifications can be submitted orally or in text form in the context of a personal contact to CHIRON Group SE, c/o Legal Department, Kreuzstrasse 75, 78532 Tuttlingen, Germany. In the case of representation or if the information concerns an employee of the Legal Department, the contact person at the above address is the Risk Management/Internal Audit Department. It is recommended that an appointment be made in advance by calling +49(0)7461 9400.

Reports can be made confidentially or anonymously. The processing status of a report submitted via the portal can be tracked on the Internet-based reporting portal.

## 3. Receipt of a tip

Upon receipt of a tip, the person providing the tip will receive an acknowledgement of receipt, unless this is impossible due to the reporting method chosen by the person providing the tip. The confirmation of receipt is usually sent immediately - within 7 days at the latest.

## 4. Processing of the report

After receipt of the report, the report is examined by the internal reporting office; the internal reporting office is the legal department or, in the case of a deputy or a conflict of interest, the risk management/auditing department.

The internal reporting office maintains contact with the person providing the information, unless this is impossible due to the choice of reporting channel on the part of the person providing the information. The internal reporting office shall examine the facts and, if necessary, discuss them with the whistleblower, unless this is impossible for the reporting office due to the whistleblower's choice of reporting channel.

If, in the course of its examination, the internal reporting office comes to the conclusion that the subject matter of the HinSchG applies and that the tip-off is valid, it will take appropriate follow-up measures. Depending on the circumstances, follow-up measures may include, in

particular, the initiation of internal investigative measures, possibly with the involvement of other internal organizational units or external consultants (lawyers in particular), the referral of the person making the report to another competent unit, or the transfer of the case to a competent authority or the closure of the proceedings - e.g. due to a lack of evidence. The results of the examination of the facts are communicated to the person making the report and, if necessary, further steps are discussed with the person making the report, unless this is impossible for MROS due to the reporting channel chosen by the person making the report.

If a legal violation is identified in the course of an internal investigation, measures are initiated depending on the facts of the case with the aim of preventing or at least containing the consequences of the legal violation and/or preventing future legal violations. As part of the implementation of remedial and preventive measures, it may be necessary to involve other internal organizational units, the management in particular.

As a rule, reports are processed conclusively within three months of receipt.

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

In principle, tips can be submitted anonymously. If a tip is submitted anonymously, no data will be recorded that would allow conclusions to be drawn about the identity of the person submitting the tip. If, when submitting a tip anonymously, the person submitting the tip provides information that could be used to draw conclusions about his or her identity, the information will be treated confidentially.

## **6. Confidentiality of a Notice; Data Protection**

Furthermore, when a report is submitted in accordance with the HinSchG, the confidentiality of personal data and other information that allows conclusions to be drawn about the identity of the person submitting the report or other persons affected by the report is guaranteed.

Only the employees of the internal reporting office can view a tip. Information is also processed in compliance with the confidentiality provisions of the HinSchG.

More detailed information on data protection and the processing of personal data within the scope of the complaint via the reporting channel of the Internet-based reporting portal can be found on the complaints page of CHIRON Group SE under the keyword "Read privacy policy".

## **7. Documentation of notices**

Information is documented in accordance with the requirements of the HinSchG, in particular in compliance with confidentiality. Pursuant to Section 11 (5) HinSchG, the documentation is generally deleted three years after the conclusion of the proceedings, unless longer storage is necessary and proportionate to meet legal requirements.

## **8. No reprisals**

Whistleblowers who report information that they had reason to believe was accurate when they made the report do not have to fear reprisals. The same applies to persons who support whistleblowers (e.g. as witnesses). The protection of such persons providing information and support is of particular concern to the management of CHIRON Group SE.

The management will not tolerate any reprisals - including threats of such measures - against persons who enjoy protection under the HinSchG and will sanction such actions appropriately.

## **9. External reporting offices**

Whistleblowers can also report violations to external governmental reporting offices. According to the HinSchG, reports to an internal reporting office are preferable if the violation can be effectively dealt with internally and the person making the report does not fear reprisals. The management of CHIRON Group SE encourages all whistleblowers to make use of the internal reporting office, as it sees this as an effective means of increasing transparency regarding the effectiveness of compliance measures and, in its opinion, complaint procedures can be processed more effectively and efficiently than with external reporting offices.

Authorities at the state, federal and EU level - depending on their jurisdiction - can be considered as external reporting bodies. Reporting bodies at the federal level include the Federal Financial Supervisory Authority (BaFin), the Federal Cartel Office (BKartA) and the Federal Office of Justice (BfJ).

Further information on the existing reporting procedures at these authorities as well as on other external reporting offices and procedures can be viewed on the website of the BfJ, which can be accessed via the following link: [website of BfJ](#)