

# REMONDIS - whistleblower system

In the foreword to our Code of Conduct, the Chairman of our Management Board, Ludger Rethmann, already pointed out that we at REMONDIS attach great importance to responsible action. It is our conviction that this can only be achieved if we observe the legal and ethical framework conditions. To do justice to these principles, it is important for us to be aware of any misconduct relating to compliance.

With its whistleblower system, REMONDIS therefore gives not only all employees but also all third parties the opportunity to report any violations of the law and internal regulations. Confidentiality, anonymity and data security are guaranteed. Every incoming report is carefully checked and any violations are systematically followed up. In this way, we are not only able to fulfil our legal corporate obligations, but also offer opportunities to pass on information to protect employees and the company. Alongside our whistleblower system, every whistleblower is free to contact external reporting bodies. Further information can be found [here](#).<sup>1</sup>

By answering the following questions, we would like to show you how our whistleblower system works. Please use this system to help us remedy any shortcomings so that we can live up to our claim to act responsibly.

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<sup>1</sup> Source: EQS Group AG (<https://www.eqs.com/de/externe-meldestellen>)

## 1. What is our whistleblower office?

To combat violations of legal regulations and/or internal company rules, the REMONDIS Group uses the services of its central Compliance Department. The Compliance Department is available to all whistleblowers who wish to provide confidential information about irregularities at REMONDIS. In the individual operating companies, the Compliance Department is represented by responsible [Compliance Coordinators](#) (see below).

## 2. Who can contact the whistleblower office?

The following groups of people can be considered “whistleblowers” and fall within the scope of the REMONDIS whistleblowing policy.

- Employees, including managers
- Contractors, consultants, service providers, business partners, third-party service providers, stakeholders (e.g. customers, suppliers) and their employees
- Former and (potential) future employees and applicants
- Voluntary interns
- Supervisory authorities
- Shareholders
- Third parties with a close relationship to a reporting person.

This policy applies to all REMONDIS businesses, departments and branches. It also applies to all countries that we operate in. If local laws, provisions or regulations require a higher level of protection than that contained in this policy, local legislation has precedence.

## 3. What issues can information be provided on?

The issues of the reporting contents are specified as follows:

- Money laundering, financing of terrorism, corruption and other criminal offences.
- Anti-competitive practices, freedom of association
- Discrimination, mobbing, equal treatment
- Violation of fundamental rights and human rights (e.g.: child labour, forced labour/slavery)
- Health, occupational safety, workplace protection
- Environmental protection, unlawful withdrawal of land
- Non-environmentally compatible handling of waste
- Withholding of appropriate wages, workplace protection
- all other violations of the German Whistleblower Protection Act (HinSchG)

The whistleblower system is not intended for complaints relating to the operational business, insofar as the aforementioned issues are not affected. Information that is reported via the whistleblower system and relates to matters that lie outside the defined subject area is passed on to the appropriate contact person with the consent of the whistleblower, or the whistleblower is referred to the appropriate contact person.

#### 4. Which reporting channels are available?

Speak to a senior manager or a responsible Compliance Coordinator at your REMONDIS company or contact the whistleblower offices provided by REMONDIS:

- Compliance Department:  
**Anonymous Compliance Hotline:** +49 2306 106-210  
**E-mail address:** [compliance@remondis.de](mailto:compliance@remondis.de)  
**By post:** REMONDIS Sustainable Services GmbH  
Compliance Department  
Brunnenstrasse 138  
44536 Lünen
  
- Chief Compliance Officer: Dr. Ernst-Joachim Grosche  
T +49 2306 106-8933  
F +49 2306 106-8936  
[ernst-joachim.grosche@remondis.de](mailto:ernst-joachim.grosche@remondis.de)

The reports can be submitted in German and English, by telephone, e-mail, post or in person directly on site.

You will find the responsible Compliance Coordinators [Compliance Coordinators](#) listed below or through the central Compliance Department using the aforementioned contact details.

#### 5. How is anonymity ensured?

REMONDIS respects and protects your identity if you decide to give anonymous reports. You can choose at any time if you wish to remain anonymous or reveal your identity.

Apart from the identity of the whistleblower, all other information from which your identity can be directly or indirectly inferred will also be treated confidentially.

If you decide to disclose your identity, you have the right to confidentiality and REMONDIS will protect your identity as far as possible. REMONDIS will also take all necessary steps to ensure that you are not subject to any restrictions.

#### 6. How are reports dealt with?

Reports and the accompanying data are treated according to the “need-to-know principle”. This principle states that only those who need the data have access to it. This ensures that only people who use the data from the reports directly for the processing of the respective case have access to it.

## **7. Are any negative consequences to be feared when making a report?**

Whistleblowers do not need to fear that staff, management or the organisation could plan, attempt or take reprisals against them. REMONDIS will protect the whistleblower against the following measures:

- Warnings or disciplinary action;
- Bullying at the workplace;
- Discrimination;
- Dismissal or termination of employment;
- Prohibition of further training;
- Any other measure which could be considered retaliation for making a report.

The whistleblower may refuse to answer any questions that they believe could harm them.

## **8. What if the content of the report does not correspond to the truth?**

A false report is one that is made intentionally or negligently. A report is not false if a whistleblower claims something that is not true but assumes it to be the truth. Whistleblowers do not need to fear negative consequences if the information subsequently turns out to be incorrect and they have not acted negligently or intentionally. In case of wilfully false reports, however, the protective effect of the EU Whistleblower Directive does not apply.

## **9. What happens if I, as the whistleblower, am involved in the incident myself?**

Our responsible Compliance Coordinators are obliged to maintain secrecy. In the investigation procedure and the sanctioning, where possible, due consideration will be given to the fact that you reported the case.

## **10. How are whistleblowers informed?**

As part of our investigation process, REMONDIS informs the whistleblower about the progress of the investigations. The company REMONDIS has undertaken to confirm receipt of the information within seven days and to inform the whistleblower of any measures planned or taken after three months at the latest.

## **11. Is data from the whistleblower stored?**

For the whistleblowing procedure, only the personal data that you provide to the Chief Compliance Officer or the respective Compliance Coordinators is stored. Moreover, any data which you do not wish to be stored is not recorded or is removed from the documentation of the respective case.

## **12. Do I incur any costs by consulting the Compliance Coordinators?**

No, there are no costs for the people providing the information.

Organisation / Company	Coordinator / Compliance Officer	Telephone	E-mail
REMONDIS Assets & Services GmbH & Co. KG REMONDIS SmartRec GmbH REMONDIS Sustainable Services GmbH	Fr. Karin Köppeler	+49 2306 - 106 - 8239	<a href="mailto:karin.koeppler@remondis.de">karin.koeppler@remondis.de</a>
REMONDIS GmbH & Co. KG (Region West)	Hr. Dr. Frank Wollny	+49 234 – 8921 - 174	<a href="mailto:frank.wollny@remondis.de">frank.wollny@remondis.de</a>
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TSR Recycling GmbH & Co. KG	Hr. Simon Wessenbom	+49 2306 - 106 - 3855	<a href="mailto:s.wessenboom@tsr.eu">s.wessenboom@tsr.eu</a>
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