

## Reporting criteria

You have the opportunity to report breaches or grievances regarding the following key areas/topics in secunet Group's whistleblowing system.

### **Corruption/conflict of interest:**

Corruption is the deliberate abuse of entrusted power or a certain position of trust for private, but not necessarily personal, gain or advantage.

The following situations may constitute offences:

- Improperly influencing the business relationship or a public official, for example by offering gifts or invitations
- Accepting facilitation payments, making facilitation payments to a public official
- Accepting personal benefits (for oneself and/or third parties) in return for disregarding internal rules and processes, e.g. for awarding contracts without following a proper tendering procedure
- Favouring friends and acquaintances when awarding contracts or selecting suppliers
- Performing activities that are in conflict with the employee's actual profession, for example for a business partner whose assignment is in the hands of the employee

### **Breaches of competition or antitrust law**

Agreements restricting competition and concerted practices between companies are not permitted. This may involve improper agreements on prices, pricing, market, customer or territory allocation, orders, production volumes, strategies, etc., as well as the unauthorised exchange of information relevant to competition and the abuse of a dominant market position.

### **Breaches of the Data Protection Act**

Breaches of regulations regarding the protection of personal data.

Examples:

- Disclosure of customer or employee data
- Unauthorised sale of particularly sensitive data (e.g. medical details, information on criminal offences committed)
- Insufficient access protection for personal data

### **Breaches of confidentiality regulations, information security incident**

Disregard of information security guidelines, for example due to:

- Non-compliance with the regulations on handling classified information
- Endangerment or disregard of building safety
- Breaches of the information security guidelines
- Wilful use of improperly licensed software in the corporate environment
- Use of IT systems for illegal, non-compliant or unauthorised activities

## **Breaches and risks relating to human rights and the environment, particularly in the supply chain**

These include:

- Prohibition of child labour
- Protection against slavery and forced labour
- Freedom from discrimination
- Protection against unlawful confiscation of land
- Prohibition of withholding reasonable wages
- Right to form trade unions or employee representative bodies
- Protection against torture, as well as occupational health and safety and related health hazards
- Prohibition of inducing harmful soil change or water pollution, including in own business area

## **Other breaches of the law**

Reports of criminal offences or other serious breaches that do not fall under any of the specific focal points are, for example

- Theft, fraud and embezzlement, if secunet is at risk of significant financial loss or damage to its reputation
- Sabotage or destruction of work facilities
- Disclosure of trade and business secrets
- Forgery of documents
- Breaches of tax law regulations
- Breaches of customs law and export control regulations
- Breaches of the Money Laundering Act
- Breaches of secunet's internal guidelines (e.g. breach of purchasing, signature or travel policies)
- Complaints regarding accounting-related matters (accounting, internal controls, auditing)