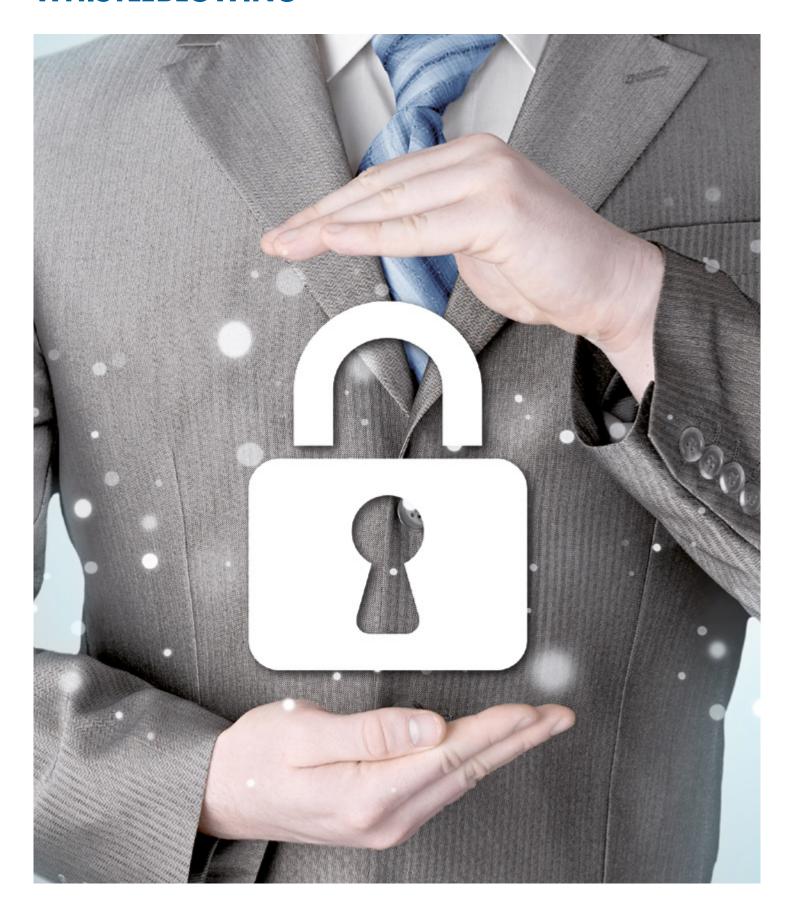


ARNTZ OPTIBELT GROUP WHISTLEBLOWING





3 WHISTLEBLOWING

THE ARNTZ OPTIBELT GROUP'S WHISTLEBLOWING SYSTEM: INTEGRITY AND TRUST

The Arntz Optibelt Group places great importance on an open and a mutual trust-based corporate culture and wants to encourage every employee to contact the company's contact persons, including supervisors, management and the work council, in the event of possible compliance risk. This also applies to our business partners and every other person, who wants to bring forward any suspected compliance violations and other malpractices in the company.

Fairness and trust are the basis for the Arntz Optibelt Group, which are also founding blocks for good working relationships, as well for a successful and sustainable business. We want to encourage everyone to use this provided anonymous reporting system when witnessing harmful behaviour – or assuming such – burdening a single employee or the Arntz Optibelt Group as a whole.

Reports will be processed anonymously and we will ensure that they will stay as such. At the same time we will investigate said reports and initiate further measures immediately if there is a justifiable suspicion. We have decided, that reports will be received by an external law office – this gives you the opportunity to enter into initial communication with the lawyer.

Your management

Reinhold Mühlbeyer

Konrad Ummen

REASONS/CONTENTS 4



5 REASONS/CONTENTS



The Whistleblowing System provided here offers the opportunity to submit your report anonymously but to also contact us. In means of establishing contact you will have the ability to exchange documents over the BKMS System and to further communicate via your own mailbox. If you wish to send a confidential message, please use the following link to access the protected online reporting system of the Arntz Optibelt Group.

https://www.bkms-system.com/aog

A note for you: if your preferred language is not listed, you may submit your message in any other language. You can also contact us at any time in any language by e-mail or post.

WHY SHOULD I GIVE A REPORT?

Obeying current legal and internal company regulations has top priority. Partnership-based relationships and trust with each other are essential for a well-founded and long-lasting cooperation. Your report will help us correct malpractice or harmful behaviour and help us reduce risks to the company and our image. You will play your part in ensuring the sustainable success of the company and the preservation of jobs.

The electronic platform has been set up for you to provide anonymous information on possible violations. This includes in particular, but not conclusively:

- Corruption/bribery
- Fraud/breach of trust/theft
- Money laundering/illegal payments
- Competition- or anti-trust violations
- Violation of data protection rules or IT security policies
- Violations against environment-, work- and health protection
- Discriminations/harassment/bullying
- Enquiries/seeking advice

PROCEDURE/ANONYMITY (

WHAT IS THE REPORTING PROCESS AND HOW DO I REMAIN ANONYMOUS?

After completing your report in the BKMS System it will be sent to an international law firm. From there, the lawyer will make initial contact with you before the notification is sent to the contact persons of the Arntz Optibelt Group appointed by the management. The law firm will comply with your request for anonymity and forward the report without disclosing your identity. We chose the BKMS System because it appoints top priority to the protection of whistleblowers and their anonymity. The functionality of the protection of anonymity is independently certified. When setting up your protected mailbox you are able to choose your own username and password. Your access data will not be visible to anyone else but you. If you happen to lose your access data, please send a new message and set up a new mailbox. If possible, please indicate the reference number of your old message, as the new mailbox does not contain the contents of your old report. Encryption and special safety routines are used to ensure the anonymity of your report.

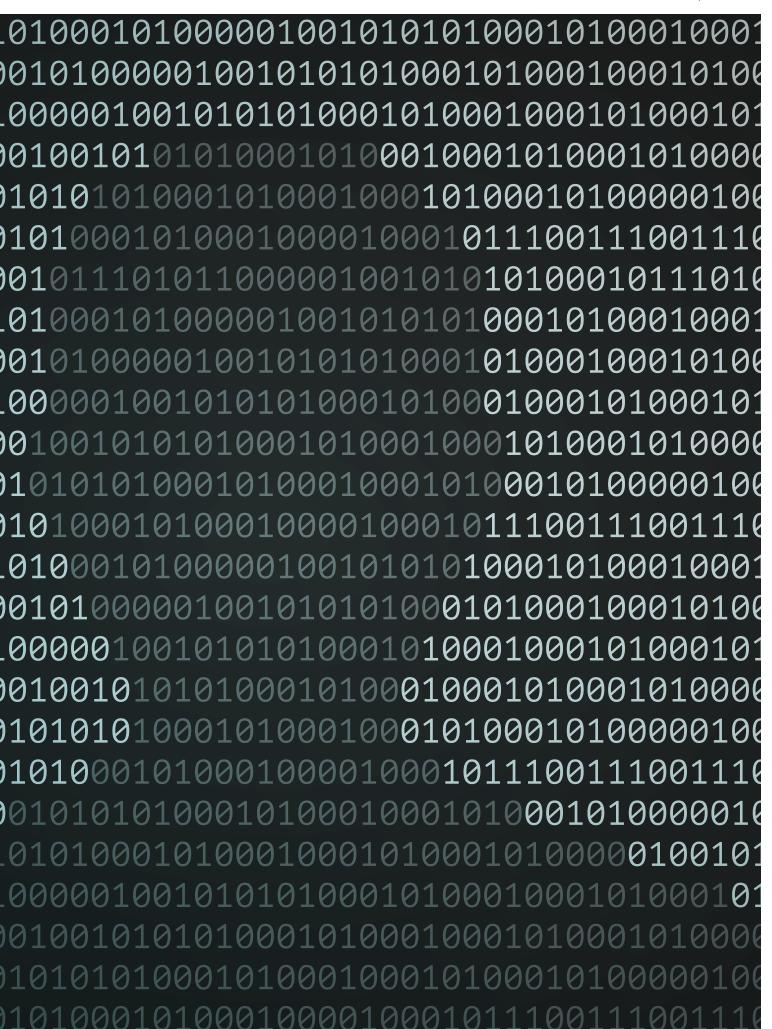
While reporting anonymously you will not have to share any personal data. Make sure not to share any data that can be traced to you and do not use any technical device, such as a computer or smartphone, provided by your employer. Notifications concerning the process of your report will be sent to your mailbox or you will be asked questions if certain details are still unclear – you will remain anonymous during this dialog. We are interested in reports to prevent damage, not in you as a whistleblower.



Here you can get to the BKMS® system:



7



Optibelt GmbH

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