



## **Questions & Answers about the Ombuds Office and the Internet-based Whistleblower System of BRITA Group ("BRITA")**

### **I. General**

#### **What is an Ombuds Office?**

The BRITA Group has appointed an external lawyer as ombudsperson in the course of fighting violations of legal regulations and/or internal company compliance rules. The ombudsperson is available as a contact person to all whistleblowers who wish to provide confidential information about serious irregularities at the BRITA Group.

#### **Who can contact the Ombudsperson?**

The Ombuds Office is available as a contact person in principle to anyone who can provide information about unlawful conduct. This may be employees, customers or other third parties. The Ombuds Office accepts all reports about suspected violations that fall within the specified topic area.

#### **What topics can I report?**

The topics which can be reported include the following - in particular:

- Corruption, money laundering, bribery, financing of terrorism
- Anti-competitive behavior
- Violations of the Code of Conduct and other internal guidelines of BRITA
- Product safety
- Discrimination, mobbing, fundamental rights
- Health, operational safety, occupational health and safety
- Human resources issues, including disregard of work instructions
- Data protection violations
- Antitrust violations

The Whistleblower System is not intended for complaints relating to operational day-to-day business. Information reported via the Whistleblower System that concerns matters outside the defined subject area will be forwarded to the appropriate contact persons subject to the whistleblower's consent, or the appropriate contact persons will be named.



## How can I submit a report?

### Ombuds Office / Ombudsperson:

Dr. Kathrin J. Niewiarra, Attorney at Law

Sybelstr. 7

D-10629 Berlin

Tel.: +49 (0) 30 / 4036750-50

[BRITA@compliance-aid.com](mailto:BRITA@compliance-aid.com)



The notes can be submitted in German and English.

### How is my anonymity ensured?

As a lawyer, the ombudsperson is subject to the lawyer's duty of confidentiality. The contact as well as all information and reports are treated absolutely confidential. This is secured by a separate data protection agreement with BRITA as the client of the ombudsperson.

Your identity will only be disclosed to BRITA with your express consent. Should your information lead to investigations by law enforcement agencies, your anonymity is also guaranteed vis-à-vis these institutions by the lawyer's duty of confidentiality.

### What happens to my information?

The ombudsperson examines the incoming hints and undertakes an initial legal assessment. Provided that the whistleblower has consented to the forwarding, the results are forwarded to the Group Compliance Manager at BRITA for further examination of the facts. An absolutely confidential treatment of the information is guaranteed. As far as the information can be substantiated, further measures will be initiated. If the information proves to be unfounded, the investigation will be terminated. In addition, all personal data will be deleted in accordance with data protection regulations.



### **Do I have to fear negative consequences if I make a report?**

If you make a report to the best of your knowledge and belief, you will not suffer any disadvantages within the company. However, if you deliberately make a false report or report in bad faith, or if you yourself have violated applicable rules of conduct, BRITA reserves the right to take legal action.

### **What if the content of the report subsequently turns out to be false?**

It is important that you believed or assumed that the content was true at the time of the report and that you did not make the report with abusive intent. If, after clarification of the facts, it turns out that the report was unfounded, you will not have to fear any negative consequences.

### **What happens if I am involved in the violation myself?**

Even then, you are encouraged to report the facts in question. This will be taken into account appropriately, as far as legally possible, when investigating the facts and imposing any sanctions.

### **Do I, as the whistleblower, incur any costs by using the Ombuds Office?**

There are no costs for the whistleblower.

### **Does my whistleblowing result in a client relationship with the Ombudsperson?**

No, there is no client-attorney relationship. The ombudsperson is and remains the representative of BRITA. However, the legal relationship between the ombudsperson and BRITA as the client has a "protective effect" in favor of the whistleblower. As a result, the ombudsperson can informally advise the whistleblower on the practical issues of the individual case, but it is not possible for her to represent your legal interests as "your" lawyer.

## **II. Internet-based whistleblowing system**

### **How can I submit a report via the Whistleblower System?**

To submit a whistleblower report via the whistleblower system, please go to [www.compliance-aid.com/BRITA](http://www.compliance-aid.com/BRITA)

Clicking on the "Submit a report" button starts the reporting process, which consists of four steps.

1. You will be asked to read an information text to protect your anonymity and to answer a security question. This security question serves to protect you from automated attacks.
2. On the following page you can report an issue, all further information is voluntary. You are free to send the report anonymously or by disclosing your identity. In addition, you can send a file with a maximum size of two megabytes as an attachment.



3. You can then set up your own protected mailbox using a user name and password of your choice, which you can use to answer questions, receive feedback and be informed about the progress of the whistleblowing process.
4. Additional attachments can also be submitted via this protected mailbox. Optionally, there is also the possibility to name personal and/or factual evidence.

### **What data is stored and in what form?**

If you submit a report via the Whistleblower System, it will be secured on the server with technically individual encryption constellations regarding content and channel and can only be decrypted by the ombudsperson. Your IP address is used only for the moment of realization of the answer to you and is immediately unavailable afterwards, because it is not logged in the application specially designed for anonymous reporting.

To make sure that already the access of the Whistleblower System cannot be traced, we recommend using the following link in a trusted environment, in a new browser window, as well as using the so-called "private window" (Firefox) or "incognito window" (Chrome): [www.compliance-aid.com/BRITA](http://www.compliance-aid.com/BRITA)

No time or geo data or other meta data of the whistleblowers will be stored. Your login data, which you can create when setting up a mailbox, is encrypted using a hash code and cannot be viewed.

### **How is the operational security of the servers ensured?**

The operational security of the servers is ensured by IT service providers, whereby the whistleblower and processing areas are strictly separated on the servers, so that any unlawful amalgamation of data can be ruled out.

### **How is data protection ensured?**

Data protection is ensured technically by encrypting the transmission of all data, by encrypting the report, which only the ombudsperson can then decrypt, and by storing the data in an external German data center.

Furthermore, it was agreed with BRITA in favor of the whistleblowers that the ombudsperson cannot be released from the attorney-client confidentiality obligation imposed in favor of the whistleblowers without their consent.