

Global Whistleblowing Policy

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A. General document information

1. Purpose and context of this document

The principle of responsible and lawful behaviour is part of Refratechnik's value structure and constitutes a basic prerequisite for entrepreneurial success and fair dealing. In line with its mission statement "*Our business activities are defined by what is legal, but much more by what is right and proper*"; Refratechnik expects the company and its employees to do the right thing.

With this group-wide Policy document, Refratechnik's intention is to adopt rules that will apply to the reporting of irregularities, thus creating a transparent and fair way of dealing with them.

This policy aims to create a corporate environment in which employees are encouraged to report unacceptable behaviour within the Group, to prevent harm to Refratechnik, employees and business associates. Unacceptable behaviour refers to any acts or omissions at work or with an impact on work that are or may be harmful or dangerous to Refratechnik and/or its employees. This includes, in particular, conduct that violates laws and regulations, conduct that violates internal rules or conduct which is unethical. This Group-wide Policy applies, inter alia, to the following matters:

- Incidents of bribery and corruption
- Antitrust violations
- Misuse of confidential customer and company data
- False accounting
- Cases of breach of trust, fraud and/or embezzlement
- Cases of harassment
- Bullying
- Other incidents potentially involving risks or harm to Refratechnik

2. Framework and scope of Policy

This Group-wide Policy applies to all employees of the Refratechnik Group, regardless of their area of activity or duties. Notifications can also be submitted by other third parties.

B. Process of submitting a report

1. Whistleblowing platform

As from 01.01.2023, Refratechnik is providing an online platform (hereinafter referred to as the "Platform") on which employees may report information on unacceptable conduct as defined in A. 1. which has been committed or is imminent at Refratechnik.

The Platform is operated on behalf of Refratechnik by eagle Isp Rechtsanwaltsgesellschaft mbH, Neustädter Neuer Weg 22, 20459 Hamburg, which acts as a Reporting Office within the meaning of this Policy. The platform is available both on RefraNET and on the Refratechnik homepage.

2. Reporting of unacceptable behaviour

If an employee suspects that unacceptable behaviour as defined in A. 1. has occurred or is likely to occur, he or she should report this using the website of the Reporting Office referred to in para. 1.

Employees may reveal their identity when submitting reports or they may submit reports anonymously.

Reports should only be submitted where the whistleblower believes in good faith that the information, he or she has provided is correct. A whistleblower is not acting in good faith when he or she is aware that a reported fact is untrue. Where there is any doubt, a whistleblower should not present such allegations as fact but as a supposition or evaluation or as a statement made by other persons.

Reports indicating the identity of the whistleblower are preferred, since this simplifies the investigation and make it easier to ensure protection of the whistleblower.

If employees have doubts about whether a given behaviour should be considered unacceptable, they should formally discuss the matter with their supervisors or with the Compliance Department, which will keep the conversation confidential.

When submitting the report, the whistleblower is called upon to present the factual basis of the report as concretely as possible and in a manner which will be comprehensible to a third party expert. To facilitate successful investigation of violations, it is essential to obtain as much information as possible and concrete evidence regarding the facts of the case. The following questions can be used by the whistleblower as a guide:

- What happened?
- When did it happen? (e.g. specific date of incident or details on how frequently the incident occurred)
- Who was involved?
- Where did it happen?
- How was it done and how was it documented?
- Which organisational unit/department is affected?

The report will be processed by eagle lsp staff upon receipt. The whistleblower will receive a message acknowledging receipt of his or her report within a few days, but in any event within 7 working days of submitting it. An employee of eagle lsp will examine the case and remain in contact with the whistleblower to resolve any outstanding questions. If the report proves irrelevant, for example because the initial suspicion of a violation of applicable laws or internal company policies is not verified, the whistleblower will receive a message to that effect. This means that the case is closed and will not be pursued any further. Should the report be deemed relevant, eagle lsp will summarise the facts of the case and discuss it with the Compliance Department of Refratechnik Holding.

Upon receipt of the notification by Compliance, the Chief Compliance Officer (CCO) of Refratechnik Holding or the person appointed to handle such notifications will immediately carry out a preliminary examination of the matter and determine the further steps to be taken, taking the necessary precautions to ensure confidentiality. If it is necessary to involve further persons, this will be handled by Compliance. The decision as to who should be notified is made by Compliance based on the specific circumstances of the case.

If the preliminary investigation yields sufficient evidence of unacceptable behaviour to provide an adequate basis for further investigation, Compliance will initiate the further investigation and inform the management of Refratechnik Holding and, where applicable, the management of the entity concerned.

The following special feature applies to reports relating to RT Iberica:

In Spain, companies are legally obliged to report whistleblowing to the public prosecutor's office if the facts reported via the internal reporting system constitute a criminal offence according to the investigations. The management of the entity concerned, together with the management of Refratechnik Holding and with the involvement of Compliance,

will instruct the responsible office at RT Iberica to inform the public prosecutor's office about compliance with the regulations.

3. Investigation

The investigation should be carried out with the requisite diligence within a reasonable time frame. The identity of the whistleblower must be protected at all times.

The persons responsible for the investigation must take all reasonable measures to ensure that the investigation is fair and impartial. This means that, where provided for under local law, all persons who may be affected by the investigation are informed of the allegations and evidence against them and given the opportunity to defend themselves.

If necessary, the persons in charge of the investigation can seek expert advice (e.g. external legal advice or internal advice by specialist departments).

4. Results of the investigation

Once the investigation is finalized, Compliance will document the findings thereof. Compliance will engage in discussions with the management of Refratechnik Holding and, where appropriate, with the management of the affected entity, regarding the measures to be taken, and obtain a decision.

An employee who is responsible or is partly responsible for an unacceptable behaviour is not protected from disciplinary action when reporting his or her own unacceptable conduct or that of others, but this factor can be taken into account when deciding on the scope of possible disciplinary action.

The whistleblower will receive feedback on the progress of the investigation in relation to his or her report within three months of acknowledgement of receipt.

The reports and measures derived from them are presented anonymously in the annual Compliance Report.

The following applies to Spain:

Information that constitutes a criminal offence under local law must be reported to the local Spanish public prosecutor's office. External advice can be obtained from the Spanish RT Iberica and Global Compliance to check whether the information constitutes a criminal offence under Spanish law. The decision with regard to the report will be made by the management of the Spanish entity/ RT Iberica and the management of Refratechnik Holding and reported to the responsible local unit of RT Iberica.

C. Protective measures

1. Protection of the whistleblower

A report submitted in good faith cannot result in any disciplinary action for the whistleblower.

However:

- Intentional false reports and damage to employee reputation constitute an abuse of the whistleblower system, which may entail consequences under the company's internal disciplinary policy as well as under employment law and, under certain circumstances, under criminal law.

- An employee who has behaved illegally is not protected from disciplinary action simply because he or she has made a report. However, the submission of the report must be taken into account when deciding whether and, if so, what disciplinary action should be taken.

2. Confidentiality

The Reporting Office and the persons responsible for the investigation in Refratechnik will keep secret the identity of (1) the person making the report, (2) the persons who are the subject of a report and (3) the other persons named in the report. The identity of the foregoing individuals may only be disclosed to the persons responsible for receiving reports or for taking follow-up action. This applies conditionally to local specifics.

The following exceptions apply to this confidentiality requirement unless applicable law sets local specifics in this respect:

- (a) in respect of the whistleblower;
 - if the whistleblower expressly agrees to waive anonymity,
 - if the whistleblower intentionally or through his or her gross negligence submits a report containing incorrect information on violations;
 - in criminal proceedings at the request of law enforcement authorities; and/or
 - if anonymity is lifted based on a ruling in administrative proceedings or a court order.

In the cases referenced above, the whistleblower will be informed of the disclosure of data and notified of the reasons for this, to the extent permitted by law.

An exception to the confidentiality requirement also applies to the extent that the transmission of data concerning the whistleblower is necessary for follow-up measures. In this case, consent in text form to this effect will be obtained beforehand from the whistleblower.

- (b) with respect to persons who are the subject of a report and other persons named in the report;
 - to the extent necessary in the context of an internal investigation,
 - in criminal proceedings at the request of law enforcement authorities; and/or
 - based on a ruling in administrative proceedings or a court order.

Breaches of the confidentiality requirement may have consequences under employment law and possibly also under criminal law.

3. Data protection and retention of documents

Acting in compliance with the confidentiality requirement, the Reporting Office will document all incoming reports by an audio recording which is stored in a permanently accessible manner, will summarise their content by preparing a memorandum or will document their content by preparing a full and precise written record in the form of a transcript.

Furthermore, the facts of the case, the investigation measures conducted and any follow-up compliance measures will be documented by Compliance in a manner which preserves confidentiality, and such documentation will be stored in password-protected form until the expiry of a 2-year period from the conclusion of the case, unless applicable law sets a different retention period.

D. Local specifics

1. Canada

It should be noted that any retaliation against a whistleblower employee is considered a criminal offense under Canadian law and violations thereof may be punishable.

Before disclosing the identity of the whistleblower, a case-by-case decision is required in compliance with applicable laws.

Based on local law, personal data that is no longer necessary to fulfill the stated purposes must be destroyed, deleted or anonymized.

2. Spain

It should be noted that companies in Spain are obliged to report information to the public prosecutor's office after the investigation has been completed if the facts reported via the internal reporting system constitute a criminal offence after the investigation.