

Exyte's Speak Up Process



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1 Purpose

This procedure describes the organizational structure of the Exyte Speak Up System and sets out generally applicable principles for the processing of reports submitted via the Speak Up System. It is supplemented by internal standards and work instructions that further define parts of the procedure and are published internally.

2 Area of application

2.1 Material scope

The Exyte Speak Up System is used to receive and process reports and complaints about potential violations of the law, the Exyte Code of Conduct or our Supply Chain Code of Conduct and downstream Compliance-Policies of Exyte by an Exyte employee or personnel of our supply chain, provided that it concerns misconduct in the performance of or in connection with an activity for Exyte.

The Speak Up System is not open complaints about our services or products or questions about invoices and payments. Such concerns should be addressed directly to the relevant department.

2.2 Geographical scope

This procedure applies everywhere and in the same way within Exyte group.

2.3 Target audience

The specifications in this procedure are binding for the employees deployed in the SpeakUp System.

The information in this procedure is also intended for users of the Speak Up System, which is not only open to Exyte employees, but can be used by anyone who has evidence of violations of the laws or internal rules at Exyte or in our supply chain.

3 Responsibility

The Speak Up System is operated by Corporate Compliance. All incoming reports are recorded and evaluated centrally by the Corporate Compliance Speak Up Team. Depending on the content, investigations are carried out by Corporate Compliance Speak Up Team or by a local Lead Investigator.

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4 Terms and Abbreviations

4.1 Terms

Terms	Definitions
Compliance Organization	Corporate Compliance Department and regional Compliance teams
Corporate Compliance Speak Up Team	Any employee of the Corporate Compliance Department who is entrusted by the Corporate Compliance Department with the handling of Speak Up Reports
Informant	Person submitting a report
Lead Investigator	Person entrusted by Corporate Compliance Department with the investigation of a report
Report	Information on or complaints about Compliance violations
SpeakUp System	System for receiving and processing reports and/or complaints operated by the Corporate Compliance Department
Supply Chain	Suppliers and subcontractors

4.2 Abbreviations

Abbreviation	Explanation
CEO	Chief Executive Officer
HR	Human Resources
VP	Vice President

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5 Filing of a report

5.1 Who can file a report?

Everyone. Our Speak Up system is open to everyone. Both employees and informants outside Exyte can file reports.

5.2 What can I report?

Any suspicion of a violation of laws, the Exyte Code of Conduct and downstream internal Compliance regulations as well as the Exyte Supply Chain Code of Conduct, such as

- Bribery and other criminal offenses
- Conflicts of interest
- Violations of antitrust and competition law
- Data protection violations
- Topics relating to the environment, social (e.g. human rights risks) and governance issues
- Export control and sanctions
- Other similarly serious misconduct

If you would like to report accidents at work or other safety-related incidents, please contact a member of our EHS organization. If you have any questions about your employment contract or need support in case of problems between colleagues or with your line manager, your HR Business Partner will be happy to help you.

If you are not entirely sure whether a situation you have observed constitutes a relevant violation, please share your observation with us and we will investigate and evaluate the matter. Reports not made in good faith are not permitted. Any abuse of our Speak Up System is prohibited and has consequences.

5.3 How can I file a report in the Speak Up System?

The Exyte Speak Up System provides various channels for filing reports.

- You can use our digital system (www.speak-up.exyte.net) to send us reports in various languages 24 hours a day, 7 days a week, either in writing or as a verbal message. You do not have to provide your name. As this system is operated by an external service provider, you can rest assured that Exyte will not get to know your identity. The service provider stores your data on protected servers in Germany. However, the service provider does not see the content of your message. Initial access to such reports transferred to Exyte by the third-party provider is limited to the Corporate Compliance Speak Up Team.
- If you would like to send an e-mail to the Corporate Compliance Speak Up Team at our group headquarters in Stuttgart, Germany, please send it to ethics@exyte.net. Only a small, specially trained team within the Corporate Compliance Department has access to this e-mail account.

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- If you would prefer to speak to someone in person, please contact our Compliance Organization.

Alternatively, you can discuss your observation with your line manager or contact the works council first.

5.4 What kind of information should a report contain?

You will help us investigate the reported conduct if you provide a description of the event as accurate as possible, including what happened, who was involved and where it took place. If you use our digital Speak Up System, you can upload text files or images. You can submit a report even if you do not have detailed evidence, but your report should not be based on guessing only and should not be submitted without any concrete indicators for misconduct.

6 Processing your report

6.1 Who will process my report?

This is done by the Corporate Compliance Speak Up Team, which is the central intake function within Exyte to which all reports are forwarded. The members of the Corporate Compliance Speak Up Team report to the VP Compliance, who has a direct reporting line to the CEO and the chairman of Exyte's supervisory board.

The members of the Corporate Compliance Speak Up team are experienced specialists who are specially trained in handling sensitive information and objectively assessing reports.

6.2 Will I receive a notification when my report is processed?

Yes, if you submit a report via our digital Speak Up platform, you will automatically receive a confirmation of receipt immediately after submission. In addition, you will receive individual feedback within 7 days. If you contact a member of the Compliance Organization directly, they will also get back to you within 7 days.

In the further course of the investigation, we will keep in touch with you and, if possible and legally permitted, inform you of the progress and outcome of the investigation within 3 months.

6.3 How will my report be processed?

We take all reports seriously and investigate the situation if the report is sufficiently specific and plausible.

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6.3.1 Initial assessment

Our Corporate Compliance Speak Up Team documents all incoming reports. The first step is to check whether a report contains sufficient information to initiate an investigation into the matter. If we require further information, we will contact you promptly. As we do have questions in most cases, contacting you is essential. If you prefer not to disclose your identity, we kindly ask you to set up an electronic mailbox on our digital Speak Up platform. If we do not have enough information and are unable to contact you, we will close the case.

In the next step, we check whether there is a sufficient likelihood that that reported situation has taken place. The aim of this initial assessment is to establish reasonable suspicion, which forms the basis for further investigative measures. If a report gives rise to reasonable suspicion, your report will be forwarded confidentially to the member of our regional Compliance team acting as Lead Investigator or another specialist department to investigate the matter. Otherwise, we will close the case and provide you with appropriate feedback.

6.3.2 Investigation

In this phase, we examine which investigation measures are suitable, necessary and appropriate in each individual case and carry them out in compliance with confidentiality and data protection requirements (see section 7.4). This includes interviews with witnesses or other parties involved, document review or supplier audits.

If the compliance violation reported by you was confirmed in our investigation, the functions involved will develop a proposal for remediation. This could be disciplinary action, internal process improvements or instructions towards our supply chain. The remedial action will be implemented by the relevant operational departments and is followed up by the Lead Investigator.

If our investigation does not confirm the allegation, we will close the investigation and inform you accordingly.

6.4 Who will be involved in the processing of my report?

First and foremost you. We will keep you informed about the handling of your report and the outcome of the investigation. In doing so, we strive for utmost transparency while respecting the legally protected interests of other parties involved in terms of data protection or confidentiality.

Other persons or functions will be involved only if this is necessary for the investigation and if we cannot obtain the relevant information by other means. Their involvement is subject to the strictest confidentiality requirements.

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We will ensure to involve the works council whenever they have participation rights.

7 Fundamental principles of procedure

7.1 Can I make a report without providing my name?

Yes. If you submit your report via our digital Speak Up platform, which is operated by an external service provider, your name will not be disclosed to us.

7.2 Will my report be treated confidentially?

Yes, confidentiality is our guiding principle at all stages of the investigation. Neither your name nor details from your report may be disclosed without good reason.

On the one hand, we keep your identify in confidence. You can either submit your report anonymously or instruct limitations, e.g. access only for the Corporate Compliance Speak Up Team. All members of the Compliance Organization are specially trained and experienced in handling sensitive information.

Moreover, the investigation itself is also kept confidential. We will get only those involved that either need to contribute to the investigation actively or have a need to know about it. All persons involved are expressly obliged to maintain confidentiality.

The above applies unless statutory disclosure obligations are applicable or issued by public authorities.

7.3 Will I be protected from retaliation for reporting?

Yes, as set forth in the Exyte Code of Conduct, we do not tolerate retaliation.

Persons who submit reports in good faith will not be sanctioned or treated adversely for reporting. If you believe that you or any other person is being retaliated against for making a report, please inform us immediately via one of the reporting channels of our Speak Up system. We do not tolerate retaliation of any kind against our reporters. Such measures would be prosecuted as a violation of our Code of Conduct. We investigate all plausible reports on retaliation and take action against it, for example in the form of disciplinary measures or legal action.

7.4 How is a fair procedure ensured?

The aim of the investigation is to objectively determine the facts of the case. The presumption of innocence applies in the same way as in investigations carried out by public authorities. The investigation is expressly

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not carried out in order to prove the allegation. We take the same care in the search for exculpatory evidence.

The investigation is carried out in compliance with all applicable laws, such as data protection law, as well as internal regulations.

All investigative measures are carried out in accordance with the principle of proportionality, i.e. they must be suitable, necessary and appropriate to fulfill the purpose of the investigation.

Before a final assessment and decision on consequences is made, the person concerned is always given the opportunity to present their view of the matter in question.

7.5 Is the use of the Speak Up System free of charge?

Yes, the notification and any subsequent internal investigation measures will not incur any costs for you.