

Whistleblower System Policy

of

Peptido chemische und pharmazeutische Rohstoff GmbH

Am Kraftwerk 6

66450 Bexbach

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As Peptido chemische und pharmazeutische Rohstoff GmbH, we are committed to acting honestly and with integrity. The whistleblower system is intended to help identify criminal offenses and breaches of internal policies within the company that might otherwise remain undiscovered. The following section explains how reports of violations of applicable laws are handled and how whistleblowers are protected.

1. What is a whistleblower?

A whistleblower is any individual who, by submitting a report, helps identify misconduct or risks related to our business activities and supports preventing such issues in the future. This includes any unlawful, improper, or criminal activities, as well as any breach of statutory obligations and violations of internal policies.

2. How can reports be submitted?

Together with our partner, Herold Unternehmensberatung GmbH, we have established a telephone hotline and a digital reporting platform through which any employee, customer, or

business partner (e.g., service provider, supplier, etc.) may report business-related legal violations either openly by providing their name or anonymously.

The digital reporting platform can be accessed via the following link:

<https://peptido.hinweis.digital/>

Using the digital reporting platform, the whistleblower can check the current status of the case at any time via a report ID and a password, which the whistleblower sets themselves. In addition, the platform allows follow-up questions to be submitted to the whistleblower while the whistleblower remains anonymous.

Whistleblowers may also submit reports as follows:

- In person during business hours
- By phone during business hours
- By email, or
- By letter

Whistleblowers can contact the reporting office provided by our partner at:

Herold Unternehmensberatung GmbH

Vertraulich / Compliance

Hafenstraße 1a

23568 Lübeck

Germany

Phone: +49 451 160852 15

Email: sicher-melden@hub24.de

3. What should be reported?

3.1 Violations of law and breaches of internal policies

Any suspected misconduct should be reported as soon as possible. The objective is to identify criminal offenses, violations of applicable laws, and breaches of internal policies within the company that might otherwise remain undiscovered.

Whistleblowers are legally protected provided that they do not knowingly or with gross negligence submit a false report, and provided that their report falls within the scope of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz) (see Appendix 1).

3.2 Content of a report

To facilitate fact-finding, the whistleblower should provide information that is as comprehensive and specific as possible. Where feasible, reports should include the following:

- **Who?** – Which individuals are involved in the incident? Who participated? Who was harmed/affected? Who is aware of the incident? Who is concealing the incident?
- **When?** – When (date and time) did the incident occur? When did it begin? Is it ongoing?
- **Where?** – Where did the incident take place?
- **What?** – What happened? Is there an immediate risk to life or physical safety?
- **How? Why?** – How did the incident occur? Why did it happen?

4. How are reports handled?

Reports can be accessed only by specially trained case managers at Herold Unternehmensberatung GmbH. They review incoming reports for plausibility and, where appropriate, communicate with the whistleblower, including anonymously.

To assess whether a report falls within the scope of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG), the reporting office is provided via the Human Resources Department with access to a complete list of all employees and temporary agency workers for review. If indicated by the content of a report, the internal reporting office may also request access where available to data relating to former employees via Human Resources. Disclosure is limited to on-screen review; no data is transmitted. If a report is submitted by individuals who, for example, wish to report violations as contractual partners in a “professional context,” the internal reporting office may, in case of doubt, request access from other departments (e.g., Purchasing) to customer (accounts receivable) or supplier (accounts payable) lists. Where necessary, the whistleblower’s report is anonymized and forwarded to the internal point of contact (see Appendix 2) to initiate follow-up actions. The internal point of contact is supported by the case managers of Herold Unternehmensberatung GmbH and reports to Executive Management (see Appendix 2). The case is documented. It is ensured that no conflicts of interest arise in the performance of duties by the reporting office or the internal point of contact. In addition, it is ensured that the reporting office has the necessary expertise and acts independently in carrying out its activities.

5. How is the whistleblower supported and protected?

The identity of whistleblowers, as well as the identity of any individuals named in a report, is treated confidentially. Disclosure will occur only with consent unless disclosure is required by law. We aim to encourage and support whistleblowers in reporting incidents—even if they later prove to be unfounded. Whistleblowers should not have to fear any disadvantage as a result of

submitting a report. Whistleblowers must not be threatened, and no form of retaliation may be taken against them. Any person involved in such conduct must expect disciplinary and employment-law consequences. Anyone who believes they have been disadvantaged should immediately inform the manager responsible for addressing and investigating misconduct. If the matter is not resolved in this way, a formal complaint must be submitted. In certain cases, whistleblowers also have the right to pursue a claim for damages before the labor court. Conversely, if we determine that a whistleblower has knowingly made false allegations, the whistleblower must also expect (employment-)law consequences.

6. How are reports processed?

6.1 Handling of a report

Every report is followed up on carefully. The reporting office will document the reported information, including the date the report was submitted, the nature and circumstances of the reported violation, and, where applicable, the name(s) of the individual(s) allegedly responsible for the violation of law. For anonymous reports, comprehensive information regarding the relevant facts must be provided. Even if a report is submitted anonymously, whistleblowers may contact our partner, Herold Unternehmensberatung GmbH, again (by phone or via the digital reporting platform) if additional circumstances come to their attention. In addition, the reporting office may contact the whistleblower for follow-up questions via the platform's chat function.

6.2 Processing timeline

Via the reporting platform or, if the whistleblower has provided contact details the reporting office will provide an acknowledgment of receipt within 7 days, or make it available for retrieval on the reporting platform. Each report will be addressed no later than three months thereafter. In cases of particularly serious legal violations, the internal point of contact will initiate investigations without delay and, where necessary, take all required measures to stop any identified unlawful conduct.

6.3 Reporting obligation

With support from Herold Unternehmensberatung GmbH, the internal point of contact will prepare a brief statement for each report received, clearly documenting: which investigative actions were initiated, whether the suspicion reported was substantiated or unsubstantiated, and which measures were taken to remedy the violation. Where the reported violation is of fundamental significance, jeopardizes the company's financial interests, or affects the company's business or risk policy, it must be brought to the attention of all managing directors of the company.

6.4 Unsubstantiated reports

If it becomes clear that a report is unsubstantiated, the procedure will be closed. The reasons will be documented. A report is considered unsubstantiated if there is no violation of applicable law

or an internal company policy, or if the report has no connection to the company and its business partners.

6.5 Feedback to the Whistleblower

No later than three months after the acknowledgment of receipt, the whistleblower will be provided with information on planned or implemented follow-up measures and the reasons for them. The whistleblower will also be informed if the case was closed because the report was unsubstantiated. This applies only insofar as doing so does not compromise investigations or adversely affect the rights of other individuals concerned by the report.

7. What happens to reports concerning the internal point of contact or Executive Management?

7.1 Reports concerning the internal point of contact

If a report concerns the internal point of contact, the reporting office will forward the report in anonymized form directly to Executive Management, either in writing or verbally.

7.2 Reports concerning Executive Management

If a report concerns a member of Executive Management, the reporting office will forward the report to the designated deputy as the second appointed point of contact.

8. Additional external reporting channels

If whistleblowers are concerned that the company will not follow up on a report submitted through the internal reporting channel, or if they fear retaliation, they also have the option to submit reports to external reporting channels. External reporting channels include, for example, the competent authorities at the federal level, the state level, and within the European Union.

External reporting channels have been established, among others, by:

- Federal Office of Justice
- Federal Financial Supervisory Authority
- Federal Cartel Office

More detailed information on external reporting channels is available here:

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/ZustaendigkeitderMeldestellen/ZustaendigkeitderMeldestellen_node.html

In most cases, it is preferable to submit reports via the internal reporting channel to facilitate internal investigation and remediation of the violation within the company. The choice of reporting channel remains with the whistleblower.

Appendix 1

In Germany, you are protected when reporting violations that:

- are subject to criminal penalties, or
- are subject to administrative fines, if such provisions serve to protect life, physical integrity, and health, or the rights of employees and their representative bodies (for example, occupational health and safety requirements, the Minimum Wage Act, and similar regulations), or
- violate legal provisions at the federal or state level, as well as directly applicable European Union legal acts, in areas including:
 - anti money laundering and counter terrorist financing
 - product safety
 - transport safety
 - environmental protection
 - food safety
 - consumer protection
 - data protection
 - public procurement law
 - and others

Before submitting a report, the whistleblower must, exercising due care as required in the specific situation, assess whether they have knowledge or a substantiated suspicion. This means there must be sufficient reason to believe that the information underlying the report is true.

Protection is granted only to whistleblowers who have a relationship with the company (for example, as an employee, customer, or supplier).

Appendix 2

Members of Executive Management responsible for the whistleblower system:

1 st point of contact	Dr. Uwe Wahren, Managing Director	Email: uwe.wahren@peptido.de Phone: +49 68269358100
2 nd point of contact	Dr. M. Fünfroeken, Managing Director	Email: michael.fuenfroeken@peptido.de Phone: +49 68269358100

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