

April 2023

## Counsel of trust at Schüco

**Where can you as a Schüco employee find advice if you experience or observe legal infringements or unusual behaviour? How can you support Schüco in adhering to laws and other requirements?**

Internally, you can contact, for example, the Compliance team, the impartial support office, your line managers, the Executive Management Board, the HR department or the Works Council.

A counsel of trust has also been available since mid-2022 as a free external contact. The counsel of trust is an independent person of trust to whom employees and third parties can turn if they would like to give information about unusual behaviour in the company.

The counsel of trust for Schüco is Dr Carsten Thiel von Herff. Mr Thiel von Herff is an impartial lawyer and has comprehensive experience as a counsel of trust for various well-known companies.

The following are examples of areas the counsel of trust can support you with as a point of contact:

- Theft, fraud
- Discrimination
- Misconduct
- Corruption
- Workplace bullying
- Sexual harassment
- Racism
- Breaches of work safety guidelines, data protection guidelines, quality assurance guidelines or environmental guidelines
- Sharing of confidential information

### **Whistleblowing procedure**

As soon as the counsel of trust receives information, he will check its plausibility. If the counsel of trust suspects a criminal act or a breach of internal codes of conduct has occurred, he will pass on the information to the Schüco Compliance team upon agreement with the whistleblower, who can remain anonymous if applicable. The

counsel of trust will monitor the procedure while the Compliance team arranges an investigation into the circumstances reported. The legal assessment of the circumstances investigated and establishing appropriate measures to combat and prevent incorrect business practices is carried out together with the counsel of trust. The whistleblower will be informed about the procedure after conclusion of the procedure at the latest, within the limits of what is legally possible. The whistleblower can also enquire about the status of the procedure at any time.

## **Anonymity and protection of the whistleblower**

The anonymity of the whistleblower is ensured at all times insofar as the whistleblower requests this. It is therefore possible that information is passed on anonymously to the Compliance team by the counsel of trust. All communication will subsequently be made via the counsel of trust, who has a duty of confidentiality.

The protection of the whistleblower is an essential component when handling the concern. Above all, the whistleblower is protected by the fact that any retaliation against him or her will not be tolerated.

## **Contact details**

Whistleblowers can pass on their information to Mr Thiel von Herff in writing (e-mail, letter, fax), by telephone or in person:

Dr Carsten Thiel von Herff, LL.M.  
Loebellstraße 4  
D-33602 Bielefeld  
Tel.: +49 521 557 333-0  
Fax: +49 521 557 333-44  
Mobile: +49 151 582 303 21  
E-mail: [vertrauensanwalt@thielvonherff.de](mailto:vertrauensanwalt@thielvonherff.de)  
[www.report-tvh.com](http://www.report-tvh.com)



Compliance Office  
Schüco International KG  
Karolinenstr. 1-15  
D-33609 Bielefeld  
Tel.: +49 521 783-7300  
Fax: +49 521 783-9291  
E-mail: [compliance@schueco.com](mailto:compliance@schueco.com)