# Process description

## Whistleblowing System@SCHOTT

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## 1. SCHOTT Whistleblowing System

It happens sometimes that companies violate applicable regulations and laws as well as internal rules - sometimes with serious consequences for the companies concerned and the employees involved.

The SCHOTT whistleblowing system is available to SCHOTT employees, business partners and other third parties for reporting possible violations of laws, the SCHOTT Code of Conduct and SCHOTT internal regulations.

## 2. How to Make a Report

### Who can use the SCHOTT whistleblowing system?

All SCHOTT employees, business partners and third parties worldwide.

### What can be reported?

Violations of laws, the SCHOTT Code of Conduct, SCHOTT internal rules and regulations as well as other grievances within the company or along the supply chain.

### What reporting points are available for submitting possible leads?

The whistleblowing system offers the following options for submitting reports:

- **Direct contact with the Compliance Office** (e-mail or personal approach of Compliance Office employees).
- **Web-based whistleblowing system** (accessible worldwide – please note local web-based whistleblowing system SCHOTT North America. In a simple and non-traceable way, it is also possible to communicate anonymously with the Compliance Office during the entire process if desired).
- **Additional local reporting channels**

  SCHOTT Sites North America (USA/Canada/Mexico):

  - North America's Compliance Phone Hotline (24/7)
    - United States or Canada: 1-800-462-9061
    - Mexico:1-800-681-6513
  - North Americas web-based whistleblowing system managed by SCHOTT Legal North America: link to the entry form
  - Direct contact to SCHOTT Legal North America: email or personal approach

  In case you would like to submit a report locally at site, please contact your HR department for more information.

In addition to the whistleblower system, employees can contact their manager, employee representatives, HR employees, the responsible compliance representatives, and external reporting bodies such as authorities. Business partners and other third parties can also submit reports directly to external reporting bodies.

### In which languages can I submit a tip?

The SCHOTT whistleblowing system is available in numerous languages.

## What information should be included in the message?

- Description of the facts
- Location
- Time
- Affected / aggrieved persons
- Responsible persons / company
- If possible, evidence

## How am I protected when submitting a report?

Confidentiality is maintained throughout the entire process. In this context, the respective contact persons treat the identity of the person providing the information, the persons who are the subject of a report, and the other persons named in the report as confidential. The identity becomes known only to the person responsible for receiving the report or for taking follow-up action.

In accordance with legal requirements, whistleblowers are also protected from reprisals and disadvantages such as discrimination, denial of promotion, negative evaluations, dismissal, or similar behavior because of the report. Even the threat or attempt of such discrimination is prohibited. Preventing a whistleblower from making a report or violating the confidentiality of the whistleblower's identity is also not tolerated and will be sanctioned.

This protection does not apply if it can be proven that the person providing the information intentionally reported false information via the SCHOTT whistleblowing system.

## 3. Process Description

### a. Flow chart




**Whistleblower**

The Whistleblower observes a potential compliance violation.

**Report**

The report can be made through the following channels:

- Directly to the **Compliance Office**
- Via the **electronic whistleblowing system**
- Via **additional local reporting channels**

**Reception of report**

The report is received by the respective reporting office. Only the persons who receive the report have access to the content of the report itself. The respective reporting office documents the report. Receipt is confirmed by the selected contact point within 7 days.

**Reports addressed via additional channel:**

Reports made via additional reporting channels are forwarded to the Compliance Office after coordination between reporting channel and the whistleblower.

**Plausibilitycheck**

The Compliance Office* checks the plausibility of the report.
If the report proves to be implausible, the process ends here.

**Taking follow-up measures**

If the report is plausible, the Compliance Office* determines follow-up measures regarding the clarification of the facts (e.g. internal investigations).

**Conclusion of the clarification of the facts**

Preventive, sanctioning, as well as remedial measures are taken upon recommendation/with the support of the Compliance Office.

Feedback to the whistleblower is usually provided within 3 months from the date of acknowledgement of receipt.

* May differ in case reports made locally

## b. Further information on the procedure

### How long does it take to check a report?

The duration of the review depends on the scope and complexity of the matter. The review of the report is carried out by the Compliance Office and can take from a few days to several months.

### How is the report checked?

First, the Compliance Office checks the plausibility and validity of the report. This involves examining whether there are sufficient indications of a breach of the rules on the basis of the information provided. If that is the case, a further legal assessment clarifies what measures are permissible and in compliance with data protection requirements to further investigate the matter.

The presumption of innocence applies to suspects until proven otherwise. If the suspicious activity report proves to be implausible and there is therefore no initial suspicion, the examination by the Compliance Office ends. If there is an initial suspicion, the Compliance Office will determine which follow-up measures are necessary for further action in the individual case, e.g., a formal internal investigation, calling in external support, etc.

The Compliance Office ensures impartiality and adherence to data protection and employment law requirements throughout the entire fact-finding process.

### As a whistleblower, will I receive information about the status of my report?

The person making the report will be given feedback on the matter within a reasonable period of time. This feedback is usually given after 3 months by the office to which the tip-off was given. In cases where the processing is more extensive, the deadline is 6 months. The reasons for an extension of the deadline are also communicated to the person making the tip-off. The feedback also contains information on the follow-up measures taken as well as a corresponding justification.