

Speak Up Policy



Version: 1.0
Date: 29 September 2025
Filename: 20250929_GENII_Speak Up Policy 1.0_EN

Process owner: Marita Knabel, General Counsel
Approved by: Executive Board
Classification: Internal

Valid for all companies in the GENII Group

Content

	Page
1 Purpose	2
2 Scope.....	2
3 Submitting reports	2
3.1 How to submit a report.....	2
3.2 What can be reported	2
4 Handling of reports	3
4.1 Confidential processing.....	3
4.2 Procedure.....	3
4.3 Possible consequences	3
5 Protection of whistleblowers	4
6 False information	4
7 History	4

1 Purpose

Speak Up @ GENII offers all employees in our GENII Group a clear, secure, and confidential way to report misconduct, violations of our values, or legal requirements.

The aim is to protect our company and all those involved and to create an environment in which misconduct can be addressed openly. We are committed to ensuring that employees do not suffer any disadvantages as a result of making a report. In order to work effectively, it is essential that we trust and respect each other. Pressure or discrimination against anyone who has made a report or participated in an investigation will not be tolerated and will be sanctioned.

2 Scope

The Speak Up @ GENII whistleblower system was established in accordance with the EU Directive (2019/1937) on the protection of whistleblowers and its implementation in member states to give all GENII employees the opportunity to report potential violations or grievances— even in situations where it would otherwise be difficult to address the issue openly.

Reports can be made to the respective GENII group of companies (Subgroup) or to GSG GENII Software Group GmbH.

3 Submitting reports

3.1 How to submit a report

Employees are provided with a link to our digital whistleblower system, Speak Up @ GENII, via the usual communication platforms of the respective Subgroup. All employees, including managers and members of the executive board, can use this system to submit reports anonymously or choose to provide their identity and contact details.

The reporting channel is designed so that only those responsible for receiving and processing reports and those who support them in performing these tasks have access to the reports received. The report should contain all the details of the matter in question. Where possible, the report should be documented by attaching relevant documents in digital form.

3.2 What can be reported

Reasonable suspicions or knowledge of actual or potential violations that have already been committed or are very likely to occur, as well as information about attempts to conceal such violations, can be reported. This concerns violations (actions or omissions) and abusive behavior in the context of professional, official, or business activities, in particular:

- Serious discrimination, bullying, harassment
- Criminal acts such as corruption, fraud, embezzlement, theft, balance sheet falsification/manipulation, misuse of assets, misuse of financial resources, or similar
- Violations of compliance or regulatory requirements
- Serious and repeated violations of internal guidelines and procedures.
- Conflicts of interest and their non-transparent handling

4 Handling of reports

4.1 Confidential processing

All reports are handled by the external ombudsperson appointed by us. In the event of further internal investigations and follow-up measures, additional trustworthy individuals may be consulted as necessary.

The identity of both the individual making the report and the individual who is the subject of the report will therefore only be known to the aforementioned individuals. This also applies to other individuals who may be mentioned in the report.

4.2 Procedure

- The reporting office will confirm receipt of the report to the reporting individual within seven days at the latest.
- The reporting office will check the validity of the report.
- The reporting office will maintain contact with the reporting individual and, if necessary, request further information from the reporting individual.
- If there are grounds for the admissibility of the report, a more detailed investigation of the facts will be initiated. If necessary, assistance will be sought in processing the report, e.g., from legal advisors or other external consultants.
- The reporting office takes appropriate follow-up measures, such as internal investigations or referral to a competent authority.
- The reporting office provides the whistleblower with written feedback within three months of confirming receipt of the report or, if the receipt has not been confirmed, no later than three months and seven days after receipt of the report. The feedback includes, to the extent legally possible, notification of planned and already taken follow-up measures and the reasons for these.

4.3 Possible consequences

Once the investigation has been completed, measures may be taken if appropriate. These measures may include, for example:

- sanctioning of misconduct,
- initiation of organizational improvement measures in the department to prevent similar incidents in the future, or

- forwarding information to the competent authorities, e.g., law enforcement agencies, if there are actual indications of a criminal offense.

5 Protection of whistleblowers

Reporting individuals who have sufficient reason to believe that the information reported about violations was true at the time of reporting and who have contacted the internal or external reporting office with information about violations within the meaning of this policy will be protected from any disadvantages resulting from their disclosures: They shall not have to fear any unjustified measures or treatment as a result of the report, even if the information proves to be unfounded.

If reporting individuals find that they are suffering disadvantages at their workplace as a result of their actions, they should immediately inform their superiors or, if they do not consider this appropriate, their superiors' superiors or the human resources department. Employees or superiors who discriminate against whistleblowers will be sanctioned under labor law.

6 False information

Individuals who report a matter that they know to be incorrect will not be granted whistleblower protection. These individuals may face legal action.

7 History

Version	Date	Comment
1.0	2025-09-29	New version of this policy