

COMPLIANCE@WÜRTH: WHISTLE-BLOWER HOTLINE

Already since mid-2017, the Würth Group has used a web-based whistle-blower hotline to report violations of compliance to the Würth Group's compliance office, also in an anonymous manner.

At least since Edward Snowden and his revelation about the monitoring and espionage methods of intelligence agencies around the world caused a stir, the term of „whistle-blowing“ has no longer been new to the most of us. In the beginning, the topic was subject of a controversial debate; however, in the meantime the idea prevails that such information of misconduct are an important tool to counteract grievances.

Whistle-blower hotline as an important component of the compliance management system

The Würth Group uses a web-based whistle-blower hotline to report violations of compliance to the compliance office of the Würth Group. This hotline is an important component of our Group-wide compliance management system. We have already reported on these activities on numerous occasions. The hotline's usage and objective are also subject of compliance trainings, in particular of our compliance e-learnings.

Employee obligation to behave in a compliant manner

Just as we expect every employee to comply with laws and rules, we expect irregular and unlawful behavior not to be tolerated. This includes reporting misconduct to the responsible offices. In this respect, falsely understood loyalty towards superiors or colleagues is out of place. It rather is an expression of moral courage to contribute to eliminating misbehavior. This includes reporting irregularities or even criminal behavior. In the end, everyone will benefit from such moral courage.

Absolutely anonymous reporting

The whistle-blower hotline allows reporting violations of compliance to the Würth Group's compliance organization by means of an online reporting dialog, also anonymously, if desired. The system we have introduced was developed in collaboration with the external service provider Business Keeper AG. Comparable systems of Business Keeper AG have been in place in many companies for several years and have proven successful.

After setting up a mailbox, the person reporting an incident can communicate with the responsible officer, also anonymously. Anonymity is guaranteed since the system is hosted on external servers of Business Keeper AG, to which we do not have access. Data security of the system and guarantee of anonymity have been certified by different certification procedures of independent institutes (e.g. Independent Centre for Privacy Protection Schleswig-Holstein). Reports regarding Marine Fasteners can only be accessed by Gerhard Seyboth and Klaus Roth of the Group Legal Department in their function as compliance officers of the Würth Group as well as by the compliance officers appointed at business unit level. These reports are processed in close coordination with the responsible EVP and the management of Marine Fasteners. In case of conflicts of interest, reports may be processed by the Group compliance officers.

The whistle-blower system can be accessed via the intranet and the website of Marine Fasteners. On the internet, on the website of Marine Fasteners please find the link in section <https://marfas.com/compliance/>. Clicking the link, <https://www.bkms-system.net/wuerth> , will open a reporting dialog and further information, in particular a catalog of possible compliance breaches, which can be reported.

Besides the whistle-blower hotline, which is available Group-wide, you can of course also directly contact the responsible compliance officer- Brian Meskill, brian.meskill@marfas.com, 407-321-2995 regarding all compliance matters.

Stay compliant! ☺

Your Compliance Team

Below please find a summary of the most important information:

- **Reporting irregularities or even illegal behavior is an expression of moral courage and responsibility by every one of us.**

- **You can report**
 - to Brian Meskill, brian.meskill@marfas.com, 407-321-2995 **being the compliance officer of Marine Fasteners**
 - **using our Group-wide, web-based whistle-blower hotline**
 - **on the internet, on the website of Marine Fasteners under <https://marfas.com/compliance/>**
 - <https://www.bkms-system.net/wuerth>
- **Using the web-based whistle-blower hotline, you can report irregularities or even illegal behavior, also completely anonymously.**
- **All information regarding Marine fasteners will be processed in a strictly confidential manner by the responsible compliance officers in close coordination with the responsible EVP as well as the management of Marine Fasteners In case of conflicts of interest, reports may be processed by the Group compliance officers.**