

## Speak Up Process Description

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Issuer:	Group Legal & Compliance	Date of issuance:	01.01.2025
Approved by:	Group Compliance / Human Rights Officer	Date of approval:	20.12.2024
File name:	20241220_Speak-Up_Process Description_ext_final.docx		Page 1/10

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# 1. Purpose

## 1.1. What is the purpose of Autoneum's Speak Up Process?

Autoneum Group ("Autoneum") is dedicated to conducting business with fairness, integrity, and adherence to the law and our core values. This document outlines how whistleblowers can securely and confidentially report suspected misconduct or violations of applicable laws, the Autoneum [Code of Conduct](#), and the Autoneum [Supplier Code of Conduct](#) or other incidents as covered by Autoneum's Speak Up Process set out further below. For Autoneum employees, please additionally refer to Autoneum's Speak Up Directive (II-03) for more details.

It also emphasizes our commitment to protecting whistleblowers from retaliation.

## 1.2. Why is speaking up important?

If you observe or suspect misconduct at Autoneum, we strongly encourage you to speak up. Doing so is vital because it allows Autoneum to promptly address and resolve any issues. Remaining silent about possible misconduct can exacerbate the situation and erode trust.

At Autoneum, we highly value anyone who identifies and reports potential concerns. Speaking up is not only encouraged but also protected. We strictly prohibit any form of retaliation against anyone raising their voice. This transparency and protection are essential for maintaining Autoneum's reputation, success, and operational integrity.

To be able to take immediate action and solve issues efficiently, Autoneum encourages all whistleblowers to raise their concerns by using the channels provided in this Speak Up Process Description before reporting to external parties. However, this Speak Up Process does not prevent you from filing your concern with any local, EU and/or international authority or from using another established complaint procedure. A general overview of external reporting channels within the EU can be found here: <https://www.egs.com/external-reporting-channels/>

# 2. Scope

## 2.1. Who can speak up?

Autoneum's Speak Up Process is available to anyone working for, associated with, or having a business or other relationship with Autoneum. This includes employees, contractors, business partners, suppliers, shareholders, representatives, customers or any other third party, who wishes to report a concern, irrespective of where such person is located.

## 2.2. Which incidents are covered by Autoneum's Speak Up Process?

The Speak Up Process can be used to raise concerns about suspected misconduct within Autoneum, or with regard to business partners of Autoneum, including, without limitation, violations of applicable laws, the Autoneum [Code of Conduct](#), Autoneum's [Supplier Code of Conduct](#), or any policies, guidelines and documents governing Autoneum's operations. All individuals are encouraged to report any violations or concerns they believe in good faith to be true.

The following non-exhaustive list provides categories of concern covered by Autoneum's Speak Up Process, including illustrative examples falling within this category:

- **Anti-Competition**  
includes any activity in violation of antitrust or competition law, specifically activity which prevents or restricts fair competition in the market (e.g. price fixing, market sharing, exchange or disclosure of sensitive business information among competitors, any other alignment between competitors, restrictive agreements or practices towards agents, distributors et.al as well as abuse of market dominance). It includes furthermore any activity involving unfair trade practices such as misleading

or denigrating advertising, copying competitor products or deception of consumers.

- **Anti-Bribery & Corruption**  
includes any forms of influencing the decision-making process in violation of applicable law (e.g. by granting, demanding or accepting bribes, illegal payments, pay offs, kickbacks, paying incentives, gifts or entertainment etc.) in exchange for business opportunities. This includes donations or contributions to political parties/organizations/candidates in violation of the applicable laws and/or Autoneum's policies.
- **Human Resources**  
includes sexual and any other form of harassment, bullying, discrimination, workplace violence, violation of Autoneum's policies on drugs and alcohol, mistreatment of employees, threats, as well as any other workplace related violations of applicable laws or the Autoneum [Code of Conduct](#).
- **Environmental, Health & Safety**  
includes concerns related to environmental aspects of applicable laws or Autoneum's [Code of Conduct](#) or [Supplier Code of Conduct](#) (e.g. use of conflict minerals or prohibited substances, illegal disposal of waste, deforestation), failure to provide safe working conditions, violation of any environmental laws, regulations, corporate policies or procedures with respect to the handling and disposal of hazardous materials or the health and safety of individuals.
- **Fraud & Theft**  
includes fraud, theft, fraudulent insurance claims, misuse of company assets, accounting/audit irregularities, destroying evidence and forgery.
- **Fair Play & Conflict of Interest**  
includes reports on unfair and dishonest suppliers, customers, competitors or distributors dealing in violation of corporate policies and procedures, improper supplier or customer selection due to conflict of interest situation, improper negotiation or diversion of contract awards, any other unresolved conflict of interest situations, dissemination of rumors, disparaging statements about competitors and/or their products etc.
- **Securities & Capital Market**  
includes all violations of applicable capital market laws concerning deals with listed financial instruments by persons with insider information or in exposed positions, of restrictions of the disclosure of sensitive information regarding the prices of financial instruments as well as of obligations for the disclosure of information by shareholders. Furthermore, for all violations leading to market manipulation or securities trades by employees.
- **Human Rights**  
includes violations of freedom of association and right of collective bargaining, forced labor, child labor, discrimination, as well as the violation of other basic human rights, such as freedom of thought, religion and expression, slavery, servitude, torture or other degrading treatment, as well as the presumption of innocence, the right to be heard and any other human and labor rights related concerns, including within Autoneum's supply chain.

### 2.3. Which incidents are not covered by Autoneum's Speak Up Process?

You should not use the Autoneum's Speak Up Process in the following situations:

- **Emergency Situations:** Do not use Autoneum's Speak Up Process to report events that present an immediate threat to life or property. In such cases, please call the local emergency number (police, fire fighters, ambulance, etc.).

In case of an emergency in one of Autoneum's plants, Autoneum employees should further contact either their supervisor or the on-site emergency personnel (such as the first aid team or first intervention team or the on-site person responsible for Environment, Health and Safety (EHS)). For

further instructions, please refer to the Autoneum Directive on the communication of major accident / relevant incident (VII-02).

- **Employment Grievances:** Do not use Autoneum's Speak Up Process related to the terms of employment with Autoneum. Such issues should be directed to the Human Resources Department or the respective employee's supervisor.
- **Personal Disputes:** If possible, personal disputes among employees, between employees and their manager or between a third party and an Autoneum employee should not be addressed through the Autoneum's Speak Up Process but be resolved directly between the parties concerned or through the support of the Human Resources Department in case of Autoneum internal disputes.
- **False Accusations:** A whistleblower does not need proof of a misconduct to make a report, but Autoneum expects the whistleblower to have a reasonable and good faith basis for raising concerns. Intentionally making false accusations is not tolerated and may lead to disciplinary actions and/or other legal consequences.

If a reported concern does not fall within the application field of Autoneum's Speak Up Process, the whistleblower will be informed accordingly.

### 3. How and when to speak up

#### 3.1. How to speak up?

Concerns should immediately be raised as any delay in reporting may cause substantial financial and reputational damages to Autoneum. Multiple reporting channels are available to ensure concerns can be addressed effectively:

- **Direct Reporting:** Autoneum's Group Legal & Compliance Department can be contacted directly through sending an email to [compliance@autoneum.com](mailto:compliance@autoneum.com), or by sending a letter to the following address:

Autoneum Management AG  
Legal & Compliance  
Schlosstalstrasse 43  
8406 Winterthur  
Switzerland

- **Autoneum Speak Up Line:** For cases where a whistleblower is uncomfortable reporting directly or wishes to remain anonymous, Autoneum's Speak Up Line is available under the link set out in section 3.2 below.

#### 3.2. What is the Autoneum Speak Up Line and how to use it?

The Speak Up Line is an online platform which allows whistleblowers to report concerns confidentially, anonymously, and in various languages. The Speak Up Line is accessible 24 hours a day, 365 days a year. It is operated by EQS Group, which is an independent service provider. More information about EQS Group can be found under the following link: [www.eqs.com](http://www.eqs.com)

All data processed via the Speak Up Line, including all reports, related investigations and documentations, is stored on servers operated by EQS Group.

The Autoneum Speak Up Line can be accessed under <https://autoneum.integrityline.com/>





## Welcome to Autoneum's Speak Up Line

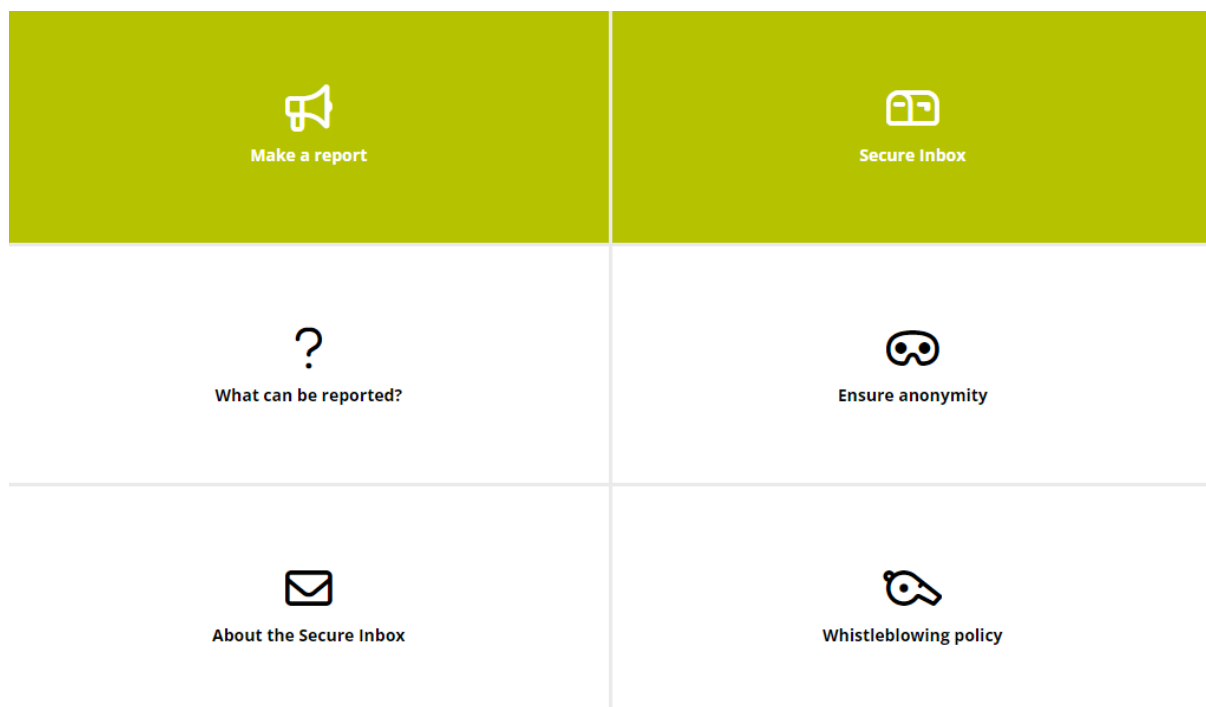
In order to support our compliance program, we wish to encourage anyone observing or suspecting misconduct at Autoneum to notify us by using our Speak Up Line through which you can quickly and easily report your concern.

The Speak Up Line should not be used to make false accusations against others or report information that you know is untrue.

You are free to provide your name or report anonymously. In any case, please open a secure inbox, as this is the only way we can communicate with you for required clarifications on the reported concern, unless you provide us with an email address or other contact information.

All reports are strictly confidential. You can find more information on this in the "Privacy Policy" section above.

To be able to take immediate action and solve issues efficiently, Autoneum encourages all reporters to raise their concerns via the Speak Up Line or other internal Autoneum channels, before reporting to external parties. However, in many countries, compliance concerns can also be reported to external authorities. For reports relating to potential misconduct in a member state of the European Union or identified by whistleblowers within the European Union, you can find an overview of such authorities [here](#).



To use the Speak Up Line, follow these steps:

1. **Choose your language** in the top right corner
2. Click on **“Make a report”**
3. **Submitting a Report:** Complete the online form in the Autoneum Speak Up Line. For submission, you will have to provide a password for creating your secure inbox and upon submission you will receive a unique “Case ID”. You must use both to log in the secure inbox.
4. **Tracking Progress:** Please regularly use the Case ID and password to log into the secure inbox to check the status of your report. **The responsible case manager might have additional questions to you. This is particularly important for whistleblowers who choose to remain anonymous, as it is the only way the case manager can communicate with you.** If you provide

your email address, you will receive an automatic notification once a message has been added.

5. **Providing Additional Information:** If you have further information to share, you can do so through the website using your secure inbox.

### 3.3. What kind of information do whistleblowers need to provide?

All concerns raised via the Speak Up Process will first be evaluated by a member of the Autoneum Legal & Compliance Department. If a case reached the Autoneum Legal & Compliance Department through direct reporting, it will be logged by the Autoneum Legal & Compliance Department in the Speak Up Line as a so-called “backend case”.

To enable an effective follow-up and a potential investigation, any report should be as detailed as possible. Whistleblowers are encouraged to provide specific answers to the following questions:

- **Where:** Where did the incident occur? Specify the country.
- **What:** What happened? Describe the sequence of events.
- **Who:** Who is/was involved? Please include details on all relevant Autoneum and external parties.
- **Where:** Where did it happen? Specify the exact location and/or department.
- **When:** When did it happen? Please provide specific dates or timeframes.
- **Impact:** Who was/is the victim and what is the potential damage (financially, immaterially, personally)?
- **Why:** Why do you believe the incident happened? What could be the motivation?
- **Ongoing issues:** Is it still happening?
- **Witnesses:** Are other persons not directly involved in the events already informed about it (HR, direct managers, witnesses)? How long have they been aware?
- **Evidence:** Is there any evidence? If so, where can it be found? Digitalized evidence can be uploaded to the Speak Up Line (refer to File Upload).
- **Additional Information:** Is there any further information that could assist the case manager in addressing the issue?
- **Contact Preference:** You can choose to remain anonymous, but if you wish to be contacted, please provide your contact information?

Please note that questions marked as “required” need to be completed to submit a report.

### 3.4. What should whistleblowers do if they do not have all the facts?

Autoneum encourages speaking up as soon as there are good reasons to suspect misconduct, ideally before any damage occurs or situations escalate.

- **Report What You Know:** If you are aware of or seriously suspect misconduct, report the facts you have. You do not need to have a complete understanding or all the details. Autoneum does not expect whistleblowers to report only if they can provide proof or ensure their concerns are fully substantiated.
- **Avoid Personal Investigations:** Whistleblowers should not attempt to investigate the matter themselves or seek additional evidence to strengthen their case.
- **Assurance of Protection:** Autoneum guarantees that no disciplinary actions or other adverse steps will be taken against a whistleblower if their genuine concern later proves to be incorrect or misguided.

## 4. Investigation – What happens after the receipt of a report?

### 4.1. General principles

After a report was sent, the whistleblower will receive a notification of receipt within the legally required time period, but in no case longer than seven working days from submission of the report.

All cases are handled and investigated confidentially.

The lead of the investigation is with a member of the Autoneum Legal & Compliance Department, who acts as the responsible case manager, under the supervision of the Group General Counsel and Head

Compliance. Autoneum ensures that all case managers will be able to act impartially and independently, have been appropriately trained and have sufficient time resources to handle the case specific investigation and are further bound by confidentiality.

At a minimum, the whistleblower will receive a confirmation that the case was handed in. Depending on the case, the whistleblower may further be contacted for additional information.

Employees who are asked to participate in an investigation are obliged to do so based on their duty of loyalty, subject to signature of a case related confidentiality undertaking.

Autoneum aims at closing an investigation within three (3) months from receipt of a report, but depending on the complexity of the case, such investigations might also take longer.

Should an investigation validate a whistleblower's concern, Autoneum will take appropriate measures, which might include disciplinary actions against employees, changes in internal processes, or amendments to Autoneum's policy framework, or any other counter measures as deemed to be necessary or legally required. The specific measures implemented will vary depending on the nature of the case.

In some cases, the payment of compensation may also be considered. However, this is a case-by-case decision. This Speak Up Process itself does not establish a general right to compensation for damages of any kind. The whistleblower will receive a notification that the investigation has been closed or an update after three (3) months, if the investigation takes longer, usually by using the channel through which the report has been submitted, unless other contact preferences have been communicated by the whistleblower. However, for personnel and data protection reasons, the whistleblower has no right to be informed neither about the details or the outcome of the investigation, nor about if and what measures have been taken.

**Important note:** If the case was handed in anonymously over the Speak Up Line, all communication mentioned in this section 4.1 will happen via the Speak Up Line, as described above under 3.2, step 4 (Tracking Progress).

#### **4.2. Who to approach if whistleblowers are concerned about the investigation**

In case of doubt whether a case has been handled appropriately, the Group General Counsel and Head Compliance, the CEO or the Chairman of the Audit Committee of Autoneum may be approached.

### **5. Confidentiality, anonymity and non-retaliation**

#### **5.1. Do whistleblowing reports remain confidential?**

Autoneum treats all reports raised via the Speak Up Process and investigations conducted as a result confidentially. Information related to a whistleblower's report is shared only with a selected group of individuals who need to know in order to support the investigation. Disclosure beyond this small group occurs only if required by law or when a significant public interest is involved. Typically, Autoneum must notify the implicated person that a complaint has been made; however, the identity of the whistleblower – if known – will not be disclosed.

Whistleblowers too play a crucial role in protecting the confidentiality of their report. Autoneum therefore asks any whistleblower not to discuss his/her concerns or the details of the report with colleagues or others outside of the formal reporting process.

#### **5.2. Will anonymity and privacy be safeguarded?**

Whistleblowers can share their concerns anonymously. However, if the anonymity of the whistleblower turns out to be a substantial obstacle or even makes the investigation impossible, the case manager might ask the whistleblower to disclose his/her identity. Even then, the identity of the whistleblower will be disclosed only to a very limited circle on a strict need-to-know basis. And after all, it will ultimately still be the whistleblower's choice to reveal his/her identity or not.



Autoneum is dedicated to protecting the privacy of all individuals involved in a whistleblower case. The responsible case manager will take all available measures to safeguard personal data from unauthorized access and processing. Personal data collected through the Speak Up Process will be used solely for the purposes outlined herein, to fulfill legal obligations, or to address a significant public interest. This ensures that the integrity and confidentiality of personal information are maintained throughout the investigation.

### 5.3. How is conformity with data protection requirements ensured?

#### **Data Management and Security:**

Even if a case is handed in through direct reporting to the Autoneum Legal & Compliance Department, all data related to such compliance reports, such as investigation reports or additional documentation, will ultimately be saved and stored in the case management system of the Autoneum Speak Up Line, which is hosted by EQS Group.

As an organization, EQS Group is certified under ISO27001 standards. At the technical level, the Speak Up Line complies with the highest standards for data protection and security. This includes that

- no personal data of whistleblowers is logged;
- the encryption of data in transit and stored data is ensured;
- no metadata analysis or research is carried out with the data;
- various security functions are activated in relation to data access and processing;
- there is a granular authorization management and role concept ensuring that access to sensitive case content is limited on a strict need-to-know basis.

#### **Access and Oversight:**

For investigation purposes the Group General Counsel and Head Compliance and the Group Compliance Officers of Autoneum will have full access to all cases and data stored in the case management system of the Autoneum Speak Up Line. Case Managers only have access to cases which they are responsible for. Additional internal or external experts supporting an investigation do not have system access but will be bound by special written confidentiality obligations with regards to the information they receive during an investigation.

### 5.4. How will whistleblowers be protected if they speak up?

Non-retaliation is a cornerstone of Autoneum's Speak Up Process. Autoneum is committed to fostering a culture, where speaking up is encouraged and protected. Anyone who reports concerns about suspected misconduct in good faith can be assured that they will be safeguarded against any and all forms of retaliation. No discrimination of any kind, disadvantage or punishment of a whistleblower, neither by Autoneum's management nor by any employees is tolerated. All retaliatory actions against whistleblowers are strictly prohibited and will be treated as a serious disciplinary matter. However, it is important to note that this protection does not extend to individuals who knowingly make false accusations.

## 6. Reporting and retention of documents

The Group General Counsel and Head Compliance provides summary reports on open cases on a quarterly basis to the Autoneum Compliance Council, which consists of the CEO, the CFO, the Head Group HR, the Head Internal Audit and the Group General Counsel and Head Compliance. In addition, the Group General Counsel and Head Compliance provides summary reports on open cases at least twice a year to the Autoneum Board of Directors.

All reports and case management files are retained externally with EQS Group, in accordance with all applicable data protection laws.

## **7. Free of charge**

The submission of a concern by a whistleblower through Autoneum's Speak Up Process as well as any procedural steps taken by Autoneum in accordance with this Speak Up Process are free of charge to the whistleblower. This also applies to the extent a complaint is considered inadmissible or unfounded.