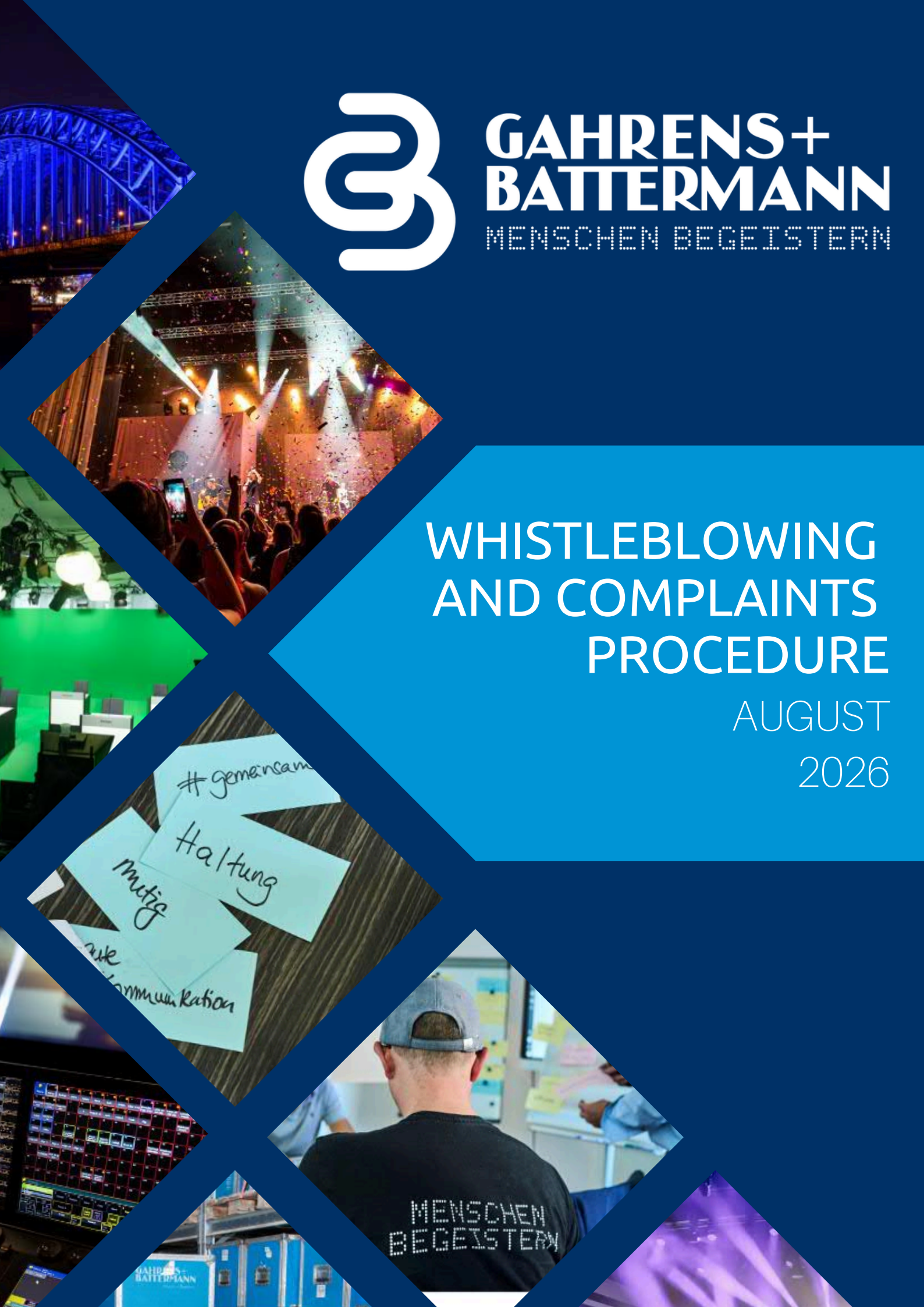




**GAHRENS+
BATTERMANN**
MENSCHEN BEGEISTERN

WHISTLEBLOWING AND COMPLAINTS PROCEDURE

AUGUST
2026



Whistleblowing and Complaints Procedure

Purpose

GAHRENS + BATTERMANN GmbH & Co. KG promotes an open corporate culture and encourages employees, business partners, and other associated parties to report potential violations of laws, internal regulations, or the code of conduct. The goal of this procedure is to identify risks at an early stage, prevent misconduct, and strengthen the integrity of the company. Reports play a crucial role in the continuous improvement of our processes and our responsible actions.

Reports can be submitted in particular regarding the following matters:

- Corruption and bribery
- Fraud and breach of trust
- Violations of labor and human rights
- Discrimination, harassment, or disadvantage
- Violations of environmental regulations
- Data protection and cybersecurity incidents
- Violations of occupational health and safety regulations
- Violations of internal policies and company principles

This list is not exhaustive. Other incidents that could harm the company, its employees, or business partners may also be reported.

Reporting Channels and Internal Reporting Office

Employees and public sector workers often notice misconduct first. Their reports help to detect, investigate, pursue, and stop legal violations at an early stage. The aim of whistleblower protection is, in particular, to protect individuals who have obtained information about violations in connection with their professional activities and report them via an internal reporting office.

At GAHRENS + BATTERMANN GmbH & Co. KG, the internal reporting office is staffed by the works council in agreement with the management. The works council treats incoming reports confidentially and ensures independent and fair processing.

For reports via email, the following address has been set up:

hinweisgeber@gb-mediensysteme.de

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[Anonymous Whistleblower Reporting Form](#)

In addition, any member of the works council is available to be contacted at any time.

Reports can be directed to the responsible supervisor, the HR department, or the management. Reports can be submitted in writing, by phone, or in a personal conversation. All incoming reports are taken seriously and processed in accordance with this procedure. Furthermore, we are continuously developing the existing system with the support of external legal counsel.

Confidentiality

All reports are treated confidentially. The identity of whistleblowers and the contents of a report will only be made accessible to persons who are deemed necessary for processing. Whistleblowers shall not experience any disadvantage, discrimination, or other negative consequences as a result of a report, provided the report is made in good faith.

Processing

Every report is carefully reviewed. If necessary, appropriate investigative, preventive, and corrective measures will be initiated, and external legal advice will be sought. Processing is conducted objectively, fairly, and with consideration for the rights of all parties involved.

Documentation

Reports and resulting measures are documented in a traceable manner and filled in compliance with data protection requirements. The findings are incorporated into the continuous improvement of processes, policies, and preventive measures. The documentation also serves to regularly review the effectiveness of this procedure.

Responsibility and Review

The management bears overall responsibility for the implementation of this whistleblower and complaints procedure. The effectiveness of the procedure is regularly reviewed and adapted to new legal, organizational, or operational requirements as needed.

Bergisch Gladbach, August 2026

GAHRENS + BATTERMANN GmbH & Co. KG