

DEVK's Whistleblowing System

Acting responsibly is our first priority. If, nonetheless, employees or partners of DEVK behave unethically or in violation of laws, reporting can be conducted via our whistleblowing channels.

How are whistleblowers protected?

1. Confidentiality

Confidentiality is our main principle. This means: The identity of

- the whistleblower,
- the persons that are subject of the report,
- and other persons named in the report

are always safeguarded.

Exception: The identity of a whistleblower who reports with wilful intent or gross negligence inaccurate information about alleged non-compliance is not protected to the same extent.

2. Protection against any form of retaliation

The compliance function strives to protect whistleblowers from any form of retaliation. Retaliation means disadvantages as a reaction to a report, such as dismissal, suspension, harassment at work or similar.

3. Objectivity

We ensure that case handling is carried out independently, impartially and free of conflicts of interests.

Which types of non-compliance should be reported?

Reporting can be submitted on the following topics:

- Corruption/bribery
- White-collar crime/fraud
- Competition crime/antitrust violations
- Violations of data protection regulations
- Conflicts of interest
- Non-compliance with sales regulations
- Money laundering/terrorist financing
- Violations of the German General Act on Equal Treatment (“Allgemeines Gleichbehandlungsgesetz”)
- Human rights and environmental risks or violations of human rights-related or environmental obligations
- Violations of DEVK-specific regulations, e.g. the Supplier Code of Conduct

Who may use the whistleblowing system?

Both employees as well as external parties can report via our whistleblowing channels

How may you report non-compliance?

Reporting via our Chief Compliance Officer
e-mail: Compliance@devk.de

What happens after submitting a report?

Acknowledgement of receipt: Whistleblowers will receive a written acknowledgement of receipt within 7 days after the report has been submitted.

Investigation: Initially, it is examined whether the report is fundamentally plausible and has substance. If the initial suspicion is confirmed, facts are investigated and clarified as part of an internal investigation. If necessary, appropriate measures are initiated, e.g. labor law proceedings, criminal law actions or the enforcement of civil law claims (e.g. compensation for damages).

Feedback: Whistleblowers will receive feedback no later than three months after the submission of a report. This includes information about planned and already initiated measures as well as the reasons for these.

Important note:

The whistleblowing system is not intended for general complaints regarding our insurances and services. Please use the separate dispute resolution channels for this purpose.