

Geiger Whistleblower System

Purpose of the Whistleblower System

Conduct characterised by integrity and compliance with regulations forms the indispensable foundation for the trust of our customers, business partners and employees, and consequently for the long-term commercial success of our company.

Inappropriate and/or illegal behaviour, as well as breaches of internal policies, can damage Geiger's reputation and cause significant losses. Geiger counteracts potential risks through its compliance organisation and an effective compliance management system. We would also like to refer you to the Code of Conduct (see I:\Information-for-All\Compliance\Code-of-Conduct).

If there are any indications of potential compliance issues, the Compliance Officer and/or the responsible manager must be informed so that the matter can be promptly clarified.

How the Whistleblowing System Works

Geiger has set up a professional whistleblowing system. Through this system, all employees can report serious compliance issues confidentially and, if they wish, anonymously.

Why should I make a report?

In addition to complying with legal and regulatory requirements, our corporate culture encourages raising concerns about breaches.

You may be aware of any misconduct that could damage Geiger's reputation or result in significant harm. By reporting such matters responsibly, you are making an important contribution to identifying risks to Geiger at an early stage and enabling measures to be taken promptly.

What types of reports should be submitted via the "Geiger Whistleblowing System"?

The Whistleblower System can be used to report suspected breaches of compliance. These include, in particular, serious human rights violations, forced labour and child labour, as well as direct or indirect support for illegitimate non-state armed groups. Bribery and corruption, money laundering, the fraudulent misrepresentation of the origin of minerals, white-collar crime, tax evasion and accounting fraud are also subject to mandatory reporting.

Furthermore, breaches of OECD Annex 2, data protection law and, in particular, Geiger's supply chain policy fall within the scope of reporting. Details on this are set out in the Geiger Code of Conduct (I:\Information-for-All\Compliance\Code-of-Conduct).

The whistleblowing system is intended for reporting information on breaches that fall within the material scope of the Whistleblower Protection Act (HinSchG). This includes, in specific:

- Criminal offences
- Offences punishable by a fine, provided that the provision infringed serves to protect life, limb or health, or to protect the rights of employees or their representative bodies.
- Other breaches of federal and state legislation, as well as directly applicable European Union legal acts, in the areas of anti-money laundering, product safety, environmental protection, consumer protection and other areas specified in Section 2 of the HinSchG.

How can I submit a report?

The Geiger Whistleblowing System offers you various ways to submit a report:

Internal report via the whistleblowing system

- **Online portal:** You can submit your report electronically via the secure online portal. The link to the portal is:



<https://app.whistle-report.com/report/6554ab77-251d-4242-a065-75cd26e0843c>

- **Telephone:** You can also submit your report by telephone (Mon-Fri: 09:00-17:00). The telephone number is:

From within Germany: +49 800 3800 999

From abroad: +49 69 99998839

- **Face-to-face meeting:** At your request, a face-to-face meeting with a person authorised to receive reports will be arranged within a reasonable time. With your consent, the meeting may also take place via video and audio link.

External reporting centres

You have the right to contact external reporting centres either as an alternative or in addition to this. Further information on this can be found on the website of the Federal External Reporting Centre at the Federal Office of Justice at:

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html

Anonymous reporting

You may choose to submit your report either anonymously or by providing your name. An anonymous report is possible, but may, in some circumstances, limit the scope for investigation and follow-up.

What happens to my report and who receives it?

If you have submitted a report via the Geiger Whistleblower System, it will be forwarded confidentially to the compliance officers. The internal reporting office will review the report and, in the event of serious breaches, refer the matter to the Compliance Committee.

Procedure

1. **Acknowledgement of receipt:** The internal reporting office will confirm receipt of your report within seven days at the latest.
2. **Scope assessment:** A check is carried out to determine whether the reported breach falls within the material scope of the Whistleblower Protection Act.
3. **Substantiation check:** The internal reporting office assesses the validity of the report received.
4. **Contact:** The internal reporting office will keep in touch with you and, if necessary, request further information from you.
5. **Follow-up actions:** The internal reporting office will take appropriate follow-up actions (e.g. internal investigations, referral to other competent bodies, closure of the case).

Feedback

The internal reporting office will provide you with feedback within three months of confirming receipt of the report. This will include details of planned and already taken follow-up measures, as well as the reasons for these. Feedback will only be provided to the extent that it does not interfere with internal enquiries or investigations and does not infringe upon the rights of the individuals who are the subject of a report.

Confidentiality and data protection

Protection of the whistleblower

A central principle of the Geiger Whistleblower System is the protection of the whistleblower. The identity of the person making the report is treated confidentially. Only those responsible for receiving reports or taking follow-up action, as well as those assisting them in carrying out these tasks, are granted access to the reports received.

Processing of personal data

The internal reporting office is authorised to process personal data to the extent necessary to fulfil its duties. The processing of special categories of personal data is permitted where this is necessary to fulfil these duties. In such cases, specific and appropriate measures are put in place to safeguard the interests of the data subject.

Documentation and deletion

All incoming reports are documented in a manner that allows them to be retrieved permanently. The documentation is deleted three years after the conclusion of the proceedings, unless longer retention is necessary and proportionate in order to comply with statutory or other requirements.

Consent to audio recordings

In the case of reports made by telephone or via any other form of voice communication, a permanently accessible audio recording of the conversation may only be made with your consent. If such consent is not given, the report will be documented by a summary of its content.

Protection against reprisals

Whistleblowers are protected against reprisals. Reprisals directed against whistleblowers are prohibited. This also applies to threats of reprisals and attempts to carry out reprisals.

If a whistleblower suffers disadvantage in connection with their professional activities and claims to have suffered this disadvantage as a result of a report or disclosure under the Whistleblower Protection Act, it is presumed that this disadvantage constitutes reprisal for that report or disclosure. In this case, the person who has disadvantaged the whistleblower must prove that the disadvantage was based on sufficiently justified grounds or that it was not due to the report or disclosure.

Who can make a report?

A report may be made by anyone who has obtained information about breaches in connection with their professional activities or in the run-up to taking up professional activities. This includes, in particular:

- Employees
- Those employed for the purpose of vocational training
- Persons in a status similar to that of employees

Temporary agency workers assigned to the employer may also use the internal reporting channels. Furthermore, individuals who are in contact with Geiger as part of their professional activities may also use the internal whistleblowing system.

Choice between internal and external reporting

You may choose whether to contact Geiger's internal reporting office or an external reporting body. In cases where the breach can be effectively addressed internally and you do not fear reprisals; you should give preference to reporting to the internal reporting office. If a breach reported internally has not been remedied, you are free to contact an external reporting body.

It is prohibited to obstruct or attempt to obstruct reports or the communication between the whistleblower and the reporting office that follows a report.

Independence of the internal reporting office

The persons entrusted with the duties of the internal reporting office are independent in the performance of their duties. They may carry out other tasks and duties alongside their work for the internal reporting office. It must be ensured that such tasks and duties do not give rise to conflicts of interest.

The employer shall ensure that the persons entrusted with the duties of an internal reporting office possess the necessary expertise.

How do I receive a response whilst remaining anonymous?

The Compliance Officer will provide you with feedback on what is happening with your report via the communication channel you have specified. All correspondence relating to your report will be treated confidentially.

If you have submitted your report anonymously, you can remain anonymous provided you collect feedback via a suitable communication channel (e.g. a secure inbox on the online portal).

Will I receive a final report once I have submitted a report?

Every whistleblower will first receive an acknowledgement of receipt. Once the investigation has been completed, the whistleblower will receive confirmation that the matter has been closed. For data protection reasons, we ask for your understanding that no detailed information regarding the outcome can be provided to the whistleblower; this applies in particular to any disciplinary measures.

Contact

If you have any questions about the whistleblowing system, please contact the Compliance Officer, Ms Susan Becker:

Email: compliance@geiger-edelmetalle.de



<https://app.whistle-report.com/report/6554ab77-251d-4242-a065-75cd26e0843c>

Further information

Further information on the Whistleblower Protection Act can be found at:

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html

This policy comes into effect on: 10 June 2026