

Report a concern policy

1. Objective / introduction

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. However, all organizations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them promptly, in particular to address any unethical conduct and prevent recurrence.

The purpose of this policy is:






- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide staff with guidance as to how to raise those concerns.
- (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

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1. What types of concern should be reported?

- 1.1 **Reporting a concern** is the disclosure of information which relates to suspected wrongdoing by a Gurit employee or Gurit contractor. This may include:

| Environment | Social and Human resources | Business-Ethics | Financial Mismanagement | Cybersecurity & Data protection |
|--|--|---|--|--|
|  |  |  |  |  |
| Damage to the environment; product safety and hazardous materials, breach of water management guidelines, etc... | Danger to health and safety; Modern slavery and human rights breaches, Unlawful discrimination, workplace or sexual harassment, breach of our internal policies and procedures including our Code of Conduct; etc... | Bribery or - corruption, anti-competitive behaviour, unauthorized disclosure of confidential information; undeclared conflict of interest, etc... | Insider trading or market abuse, facilitating tax evasion; financial fraud, money laundering, etc... | Violation of data privacy laws and internal policies, acts or omissions compromising confidentiality and integrity of our data, etc... |

- 1.2 If you have any genuine concerns related to suspected wrongdoing affecting any of our activities, you should report it under this policy.
- 1.3 If you are uncertain whether something is within the scope of this policy, you should seek advice from the General Counsel. If in doubt, please speak up – we welcome any report or concern raised in good faith.

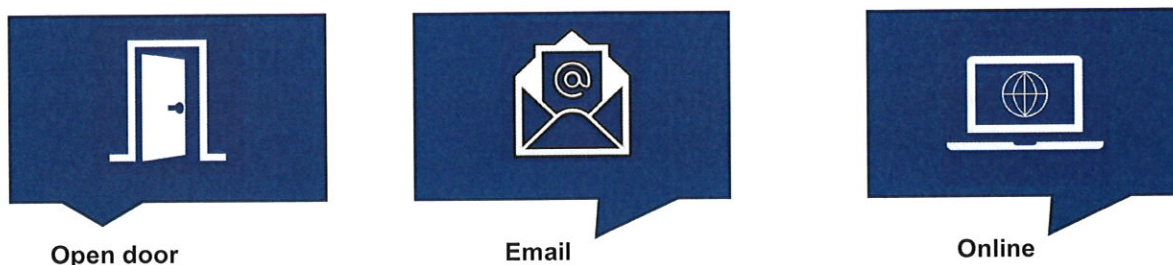
2. Channels to report a concern?

- 2.1 We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

2.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- The Human Resources Department
- The Legal Department
- Group Management
- The Audit and Corporate Governance Committee of the Board of Directors of Gurit Holding AG.
- or use the "Report a concern" online platform.

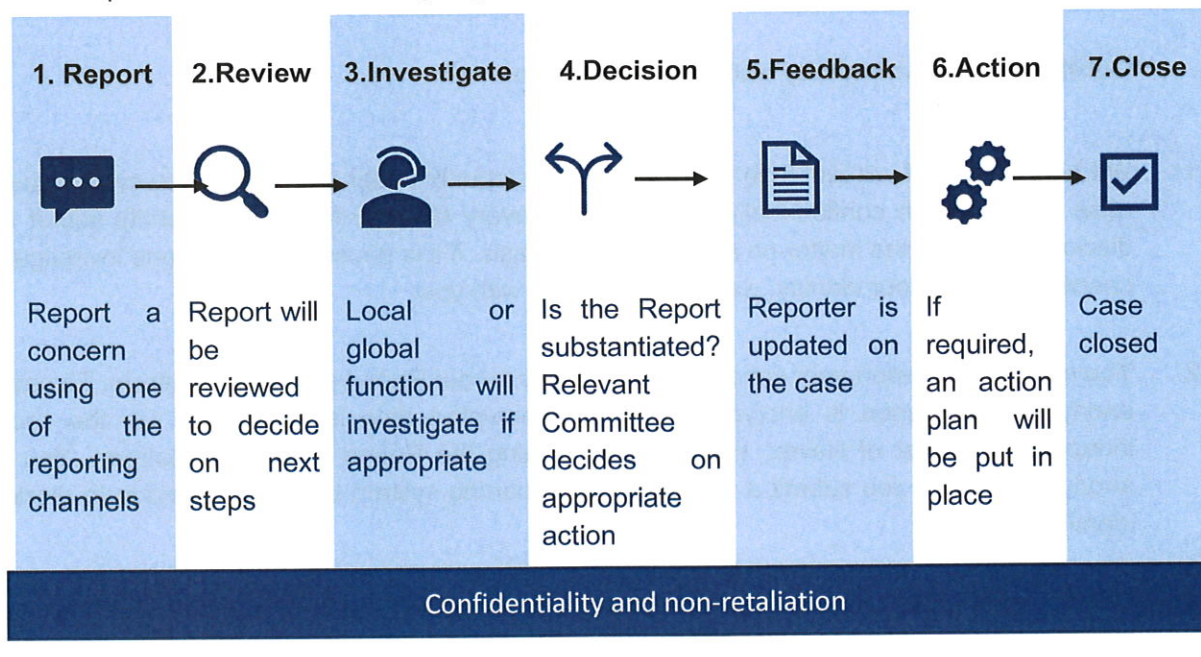
All contact details are available at www.gurit.com/report-a-concern



2.3 Please note that the more factual information you can provide (who, what, where, when, why and how) and supporting evidence if available (documents, photos, witnesses etc.), the higher the chance that your report will be able to be successfully investigated and appropriate steps taken.

3. Procedure on handling reports

All reports that are submitted by any means specified in this Policy will be handled as follows:



Phase 1: Report will be acknowledged within 7 days from receipt.

Phase 2: Review. We will review the report carefully and if it contains sufficient, clear information concerning alleged misconduct, we will open a case.

Phase 3: Investigation. A case handler will be appointed and given access to the Gurit report a concern platform to view the report and related information. Reports that contain allegations related to serious wrongdoing will be managed by the General Counsel and escalated to the Audit Committee. Other matters may be assigned to case handlers. We may arrange a meeting with you to discuss your concern.

Phase 4: Decision The case handler will determine whether misconduct has occurred, and recommendations will be made for action if appropriate.

Phase 5: Feedback You may be required to attend additional meetings in order to provide further information. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, the outcome or any disciplinary or other action taken as a result. You should treat any information about the investigation as confidential and not discuss the matter with anyone.

Phase 6: Action. As well as disciplinary proceedings in substantiated cases of misconduct, other actions may be recommended whether or not misconduct has been identified, for example training, process improvement actions or organizational changes.

Phase 7: Close of the case

4. Confidentiality, Anonymity and Data Protection

- 4.1 We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret and only disclose details of the matter on a need-to-know basis. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 4.2 You may always report your concern anonymously on our Report a concern platform. To protect your anonymity, the report is encrypted, and the encrypted data is transmitted via the secure and independent server of Navex, the company hosting the Report a concern platform. You will stay anonymous when you submit a report via this reporting system unless you decide to disclose your identity.

4.3 We will make every effort to investigate anonymous reports of misconduct, but you should be aware that proper investigation may be more difficult or impossible if we cannot get in touch with you to request further information. It is difficult to substantiate allegations without clear evidence.

4.4 Personal data will only be processed in compliance with applicable data protection laws and the report and related personal data will not be retained longer than necessary.

5. Protection and support of reporting person

5.1 It is understandable that individuals reporting a concern are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

5.2 Individuals reporting a concern must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Department immediately.

5.3 You must not threaten or retaliate against individual reporting a concern in any way. If you become aware of a report which has been made anonymously, you should not attempt to ascertain the identity of the reporter. Anyone attempting retaliatory steps against a reporter may be subject to disciplinary action.

6. Who is responsible for this policy?

6.1 The board of directors (the Board) has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

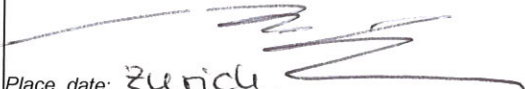
6.2 The General Counsel shall provide the Audit Committee with a regular report of all reports received and an update on ongoing and recently closed investigations.

6.3 The General Counsel has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance. The General Counsel must ensure that regular and appropriate training is provided to all managers and other staff who may deal with concerns or investigations under this policy.

6.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the General Counsel who will involve the Board or the Audit Committee where appropriate.

7. Contacts

All up to date contact details are available at www.gurit.com/report-a-concern

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