

Whistleblower system

Please let us know if anyone breaks the rules

Rules and standards are the pillars of a fair and peaceful society. Our ethical principles have to be observed by ourselves and our partners. By reporting any breaches of our fundamental values, you can help us identify and stop misconduct at an early stage to prevent damage to our company and partners.

We, the Sennheiser Group, would like to encourage our own employees and those of our affiliates, as well as any other affected individuals and their representatives (“whistleblowers”), to contact us if they have any information about risks, breaches of rules or suspected breaches in relation to the Sennheiser Group, and to openly report any such incidents without fear of reprisals. These rules of procedure are aimed at all whistleblowers and are intended to answer questions about the whistleblowing process.

We will protect any whistleblowers who report a substantiated breach. Their identity will remain confidential. Anyone who discriminates against whistleblowers will be deemed to have violated our ethical principles and will face disciplinary measures. Although it is easier to process reports when whistleblowers disclose their identity to our Compliance Committee, we would like to make it clear that reports can also be submitted anonymously. As a matter of principle, a whistleblower’s identity will only be shared within our company when processing a report if they have given their consent.

How can I report an incident?

You can report an incident at any time – and in any language – as follows:

- **You can email the Sennheiser Compliance Committee at *compliance@sennheiser.com***
- **You can call *+49 5130 600 000***
- **You can send a letter to *Sennheiser electronic SE & Co. KG, LkSG-Beschwerdeverfahren, Am Labor 1, D-30900 Wedemark***

Whichever reporting channel you decide to use, the information you provide will always be treated according to these rules of procedure.

What kind of breaches can be reported?

Our whistleblower system can be used to report risks, breaches of rules or suspected breaches with regard to the points listed below.

Here are some examples:

- Human rights abuses, occupational safety breaches and violations of social standards, e.g.
 - sexual harassment, discrimination or racism
 - child labour, forced labour or slavery
 - disregard for freedom of association
 - dangerous working conditions or violations of physical and mental integrity
 - unlawful evictions or the unlawful deprivation of land
 - unlawful use of private or public security forces
 - violations of people’s natural environment due to water, soil or air pollution
- Environmental concerns, e.g.
 - breach of the Minamata Convention on Mercury
 - breach of the Stockholm Convention on Persistent Organic Pollutants

- breach of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- Corruption, embezzlement or theft
- Breaches of privacy or data protection crimes
- Violations of (technical) safety guidelines, environmental standards or accounting principles

What should I include in my report?

It is important to make your report as specific as possible so that it can be processed effectively by our Compliance Committee. Please include the following in your message:

- Your contact details (or anonymously without a reply)
Name, telephone number, email address, etc.
- When did it happen?
Date, time, duration, frequency
- Where did it happen?
Country, location, factory, etc.
- Who was involved?
For example, names of the relevant individuals
- What happened? (We need this information)
Detailed description of the suspicious incident, the circumstances and the general facts
- Did anyone else notice the suspicious behaviour?
Witnesses, names, telephone numbers, email addresses, etc.
- Further information
Please use this section if you would like to share any additional information with us (e.g. motives of the person concerned, regulations breached by the person concerned).

Who will process your report and how?

All reports are received and investigated by members of our Compliance Committee, who are functionally and organisationally independent of the departments and bodies under investigation and are not involved in their business and operations. They are not subject to instructions when performing their tasks and reviewing their investigation results (including when determining the scope of the investigation and reporting on their results).

- Once your report has been received, you will usually be provided with confirmation of receipt within seven days.
- The content of your report will then be checked to make sure it is acceptable and relevant. Your report will be deemed acceptable if it contains sufficient and plausible information about a potential risk or breach and enables the matter to be investigated further. Your report will be considered relevant if the initial check reveals actual indications of the risks or breaches described above.
- If your report is neither acceptable nor relevant, the matter will not be investigated further. If this is the case, you will be informed that no follow-up action is to be taken in relation to your report.

- In all other cases, Sennheiser will arrange the necessary investigations to follow up on the report and conclusively determine the facts of the matter. It is not unusual for questions to arise during this phase, so you may be asked to clarify a few points as the whistleblower.

All reports are processed by the Compliance Committee in accordance with the GDPR. You can find more information about data protection in Sennheiser's privacy policy: <https://de-de.sennheiser.com/datenschutz>. All reports are taken seriously and processed thoroughly and systematically. Of course, those involved in the matter are given the opportunity to comment as soon as possible.

The members of the Compliance Committee keep track of every report until it has been finally resolved. If you report an incident and the Compliance Committee wishes to refer the matter to an internal or external body, you will be informed in advance unless you have submitted an anonymous report. All personal data collected over the course of the whistleblowing process will be deleted once the matter has been finally resolved. We will only continue to store the data we need for anonymous reporting.

Anyone accused of misconduct will be presumed innocent until proven guilty. We find it important that whistleblowers and those affected are treated fairly. We ensure that whistleblowers do not suffer any form of discrimination or punishment as a result of their actions.

What will happen when my report has been finally processed?

If the investigation into your report reveals that there is a risk or a rule has been breached, appropriate preventive or remedial action will be coordinated with the relevant Sennheiser departments.

If you have chosen not to remain anonymous, you will also be notified that the case is closed and informed of the final decision. For reasons of confidentiality, we will not be able to provide detailed information about the results or the relevant measures in all cases. The time it takes us to complete the process will depend heavily on the circumstances of the case – it may last anywhere between a few days or weeks and a few months. We will try our best to provide you with final feedback no later than 6 months after you receive confirmation of receipt.

In the case of internal complaints, the person accused of misconduct and their manager will be informed in writing of the results of the investigation. If the allegations are unfounded, the person concerned will be rehabilitated on request. HR measures will be taken according to the principle of proportionality. If a business partner is found guilty of misconduct, the relevant action will also be taken according to the principle of proportionality.

Among other criteria, the following aspects will be factored into our decisions:

- What is the nature of the breach and how serious is it?
- Was it intentional or negligent?
- What is the expected damage? Can it be reversed? How likely is it to occur?
- What attitude does the person concerned have towards the breach?
- Is the person concerned willing to cooperate or make amends?
- How much influence does the Sennheiser Group have over the business partner?
- Any specific HR measures taken by our company will ultimately be based on local legislation, but may include both disciplinary action and employment law measures depending on the severity of the breach.
- If any criminal offences are identified, we reserve the right to press charges.

Does the Sennheiser Group report on reports and results?

As part of our efforts to promote a socially and environmentally sustainable business, we also report anonymously on the results of our whistleblower system every year.

Whistleblowers and other third parties reserve the right to take legal action before the national courts. By reporting any legal violations and breaches of rules, whistleblowers do not waive their right of action.