



Whistleblowing Policy at Berco | Informative Note

At thyssenkrupp integrity, compliance with the law and internal regulations are of highest priority. To ensure that these values are upheld and potential risks arising from violations are avoided or minimized, it is crucial that misconduct is identified, clarified, and remedied at an early stage. Every indication of a potential misconduct will be treated seriously and will lead to an investigation following an objective and transparent process without any bias.

We are very proud that thyssenkrupp is credited with always striving to maintain the highest ethical and professional standards. This is one of the cornerstones of our company's success and depends on adherence to the values outlined in our **Code of Conduct**.

Violations of internal regulations and/or applicable laws and even indications or suspicions of violations can be reported and will be treated seriously. All reports must be based on reasonable grounds (thyssenkrupp must have verifiable and serious information about a violation), which led the Whistleblower to believe that the reported matter is true (report made in good faith). No financial advantages are offered or provided to Whistleblowers.

thyssenkrupp strictly prohibits and does not tolerate any kind of retaliation for reporting a violation in good faith or otherwise cooperating in an investigation of a violation.

thyssenkrupp respects and complies with the EU Whistleblower Protection Directive 2019/1937 and applicable local laws having implemented a number of whistleblower channels. In particular a central electronic whistleblowing platform for the thyssenkrupp Group handled by the Compliance Investigations department at thyssenkrupp AG <https://www.thyssenkrupp.com/en/company/compliance/whistleblower-system>.

How to report Compliance Violations and how whistleblowers are protected against retaliation at thyssenkrupp is illustrated in the helping document **Whistleblowing at thyssenkrupp** which you can always download from the same site.

Berco SpA

Company subject to direction and coordination activity by thyssenkrupp AG.

Registered Office: Via I Maggio, 237 - 44034 Copparo (FE) Italy

www.thyssenkrupp-berco.com, secured e-mail: berco@legalmail.it

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R.E.A. Ferrara 130546, VAT code 01079120380, Register of Enterprises and Fiscal Code 08482780155

Corporate capital Euro 38.700.000,00 fully paid in

progress together.



To comply to the Italian legislation implementing the Directive, Berco has implemented an additional and dedicated whistleblowing platform accessible from the web site **berco.go-tell.it**. You may learn about the platform, the Italian specific legislation and the protection afforded to staff against retaliation and the scope of violations under the Whistleblowing Italian legislation, in the document **Whistleblowing in Berco** (Policy).

Reporting channels

We have made several channels available for whistleblowing. We will listen and respond appropriately, regardless of the channel chosen.

1. Report online via thyssenkrupp Whistleblower System <https://www.bkms-system.net/thyssenkrupp>. The central and independent department responsible for managing the thyssenkrupp Whistleblower System for the thyssenkrupp Group is the Compliance Investigations department at thyssenkrupp AG with direct reporting line to the Chief Compliance Officer. The Compliance Investigators entrusted with the management of the whistleblower system and the investigation guarantee impartiality, are independent, not bound by instructions and are obliged to confidentiality.
2. Direct contact, if you are a Berco Employee: talk to your supervisor or Compliance Manager.
3. Report via telephone hotline +49 201 844 505050 using Italian or any language used by thyssenkrupp.
4. File a report online or request a face-to-face meeting through Berco Whistleblowing Line, which is operated by an external service provider: <https://berco.go-tell.it/>. All reports are received locally through the Organismo di Vigilanza appointed under Lgs. Decree 231/01.
5. Contact the Organismo di Vigilanza at the following e-mail address: odv.berco@thyssenkrupp.com or via postal service addressed to: Organismo di Vigilanza BERCO S.p.A. c/o BERCO SPA via I° Maggio 237 44034 Copparo (FE). the report will reach the OdV directly, which will handle the report under its given procedure rules.

Replies to reports

thyssenkrupp will endeavour to respond quickly to reports. If an investigation is opened, thyssenkrupp will promptly investigate the matter and take corrective action if necessary. thyssenkrupp will endeavour, where possible and permissible, to keep the reporter informed in line with our helping documents above mentioned.

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Berco Organismo di Vigilanza, composed by external professionals, will receive all matters raised through Berco EU Whistleblowing Line and will classify the case with the utmost seriousness and timeliness. Dependent of the case, the OdV may deal with the report directly or may involve external consultant and Compliance Investigations or assign the case to Compliance Investigation according to **Whistleblowing at Berco**.

External channels

thyssenkrupp encourages all issues to be reported internally through the available whistleblowing channels. All reports are handled with the utmost seriousness and timeliness. However, under certain circumstances, you may report your concerns to the relevant authorities in your jurisdiction according to applicable laws. In Italy, reports may be addressed to ANAC (Autorità Nazionale Anticorruzione). Current information on this channel and on the conditions to report are available in the policy **Whistleblowing at Berco** and on ANAC website: <https://www.anticorruzione.it/-/whistleblowing>

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