



Whistleblower system

Introduction of a whistleblower system

Dear Colleagues,

Compliance with the law and regulations - in particular compliance with our Code of Conduct - is very important to the Adler Group's management.

Our Code of Conduct and our guidelines are intended to help us act correctly and fairly in our day-to-day work. Legal requirements must also be complied with in order to secure the trust of our contractual partners and thus also to protect our economic success. It is therefore very important to us that you can report suspected irregularities or potential violations of our internal guidelines or legal regulations to us without hesitation.

You have all probably heard or read about Edward Snowden or other whistleblowers in the media and found out what extent the scandals uncovered by whistleblowers were in part, but also what public pressure the whistleblowers are exposed to.

It is all the more important that whistleblowers are protected from reprisals - i.e. pressure or retaliation - if they report potential violations or grievances in good faith.

With this in mind, you can, from today on and regardless for which of the companies of Adler Group you are working, use our new whistleblower system

<https://adler.integrityline.org>

to anonymously report issues which, in your opinion, could represent potential violations of legal requirements or internal guidelines. The technology of this whistleblower system is made available to us by EQS Group AG, a recognized service provider in the field of corporate compliance and investor relations. You can use this whistleblower system to submit your information completely anonymously so that maximum security is guaranteed for you. You alone decide whether and how long you remain anonymous. EQS also has no technical means of accessing your data.

The following authorized persons have access to the Integrity Line and receive your information:

- Astrid Looks - Head of Compliance & Risk Management
- Andrea Wolf - Senior Compliance Manager
- Svea Martens - Compliance Manager
- Ramona Rummel - Compliance Manager

You can also access the whistleblower system at any time from any other computer using the link above.

Of course, you can still contact the compliance department in confidence, personally, by phone or by email (compliance@adler-group.com).

The whistleblower system is not intended to be used to discriminate against others or to resolve conflicts in the workplace. We will not tolerate false accusations against better judgement. Let us treat one another with trust and respect!

The Senior Management

Thierry Beaudemoulin Maximilian Rienecker Sven-Christian Frank
Theodorus Gorens Jürgen Kutz