

Whistleblower directive

of VEMAG Verlags- und Medien AG
and all affiliates

Our whistleblower system

We want to know about violations and misconduct at VEMAG at an early stage so that we can take appropriate countermeasures and prevent possible damage to our employees, our business partners, other affected parties, the environment and the company.

Our independent, impartial and confidential whistleblower system offers the possibility to report illegal situations.

Why does the whistleblower directive (HinSchG) exist and what does it regulate?

Individuals who, in the course of their professional activities, discover violations within the company may report such violations to designated reporting authorities without fear of retaliation.

The following serious violations and ethical offences are covered by the whistleblower directive: fraud, theft, bribery, corruption, money laundering, financing of terrorism, violation of data protection regulations, violation of environmental protection, harassment, discrimination and other violations of laws, guidelines or the VEMAG Code of Conduct.

We follow up all indications fairly and impartially. Selected and trained employees of the FIU check all reported incidents with the same care and in compliance with legal requirements.

All notifications are processed in a protected manner in accordance with the applicable data protection regulations. It is also possible to submit anonymous reports.

What reporting offices are available at VEMAG?

Internal reporting office:

The channels of our reporting office are operated by the Federal Gazette. All incoming information is entered into our secure portal and processed confidentially by our internal contacts Erika Breul and Lena Katzenberger.

Whistleblower portal:	https://vemag.hinweisgeberportal.de
Hotline:	0800-1234-205 (Mon - Fri, 08-18)
E-mail:	hinweisgeberportal@bundesanzeiger.de
Post/visit:	Whistleblower Service c/o Bundesanzeiger Verlag GmbH Amsterdam Str. 192 50735 Cologne

External registration office:

Federal Office of Justice
Federal External Reporting Office
53094 Bonn

E-mail: hinweisgeberstelle@bfj.bund.de

Phone: 0228 99 410 6644

What happens after a report?

- 1) Receipt of the report: acknowledgement of receipt within seven days of receipt in the whistleblower system.
- 2) Assessment of the reported facts: first plausibility check of the report by independent and trained staff of the FIU.
- 3) Investigation: comprehensive investigation of the potential breach when an initial suspicion arises.
- 4) Follow-up: take appropriate and effective follow-up action when the wrongdoing is confirmed in order to end or minimize breaches and/or risks.
- 5) Communication with the whistleblower during the investigation: information on processing status no later than three months after receipt of the report.
- 6) Completion of the process for several reasons:
 - The wrongdoing has not been confirmed.
 - The misconduct has been stopped.
 - The follow-up actions have remedied the misconduct.

Whistleblower tips:

Reports should be as specific as possible and should answer these five questions as precisely as possible:
Who? What? When? How? Where?

It should also be possible for non-specialists to understand the descriptions. A close exchange with the FIU is possible via the reporting portal, therefore anonymised.

The whistleblower system is intended only for reports of actual or alleged infringements, but not for general complaints, product inquiries or other customer concerns.

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