



**Code of Procedure
for Whistleblowing throughout the Supply Chain
of ADAC e.V., ADAC SE and ADAC Stiftung¹**

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This Code of Procedure also applies for all companies in which ADAC e.V., ADAC SE or ADAC Stiftung is the majority shareholder either solely or jointly. However, the Code of Procedure does not apply to the ADAC Regional Clubs.



Introduction

ADAC e.V., ADAC SE and ADAC Stiftung as well as all companies in which ADAC e.V., ADAC SE or ADAC Stiftung is the majority shareholder either solely or jointly (hereinafter referred to as "ADAC") want to fulfil their responsibilities in society as well as towards their employees, customers and business partners.

To this end, ADAC complies with the applicable requirements in the area of human and environmental rights. However, ADAC is aware that there can still be risks and violations. To minimise these risks and prevent violations, ADAC has established a separate process in its whistleblowing system on the basis of the statutory provisions of the German Supply Chain Act (LkSG, *Lieferkettensorgfaltspflichtengesetz*). Through this, concerns about conduct within ADAC or by its (in)direct suppliers can be reported at any time. This relates to both ADAC's own area of business and the direct suppliers and their supply chains.

Whistleblowers help considerably to safeguard social and constitutional values and thereby also contribute to ADAC's success.

The following Code of Procedure refers exclusively to whistleblowing in relation to types of concerns that fall under the scope of the Supply Chain Act.

For what types of concerns or whistleblowing reports can the procedure be used?

The procedure described here relates exclusively to the reporting of information relating to the following types of concerns in accordance with the Supply Chain Act:

- Violations of human rights
- Violations of environmental protection codes

Violations of human rights and environmental protection codes include:

- Discrimination
- Refusal to pay the minimum wage
- Child labour/slavery/forced labour
- Environmental violations
- Violations of human rights by security forces
- Violations of freedom of association
- Inadequate health and safety standards
- Violations of proprietary rights

A detailed description of the types of concerns is available in the ADAC whistleblowing system itself.

Please note: Complaints about ADAC's performance are not processed through this system. Please use the following link for this purpose: www.adac.de/lob-kritik.

Whom might reports about the violations listed above relate to?

A whistleblowing report might relate to ADAC's own area of business or the area of business of ADAC's (in)direct suppliers.



Via which channels can whistleblowing reports of the above violations be submitted?

For the reporting of incidents, ADAC has established a standardised, internet-based whistleblowing portal from Business Keeper GmbH (BKMS® Incident Reporting) – the ADAC whistleblowing system – which can be accessed and used by anyone free of charge. The provision of a postbox for follow-up communication is also completely free of charge.

The reporting of information and the subsequent communication can be anonymous or associated with you by name. The ADAC whistleblowing system also allows information to be submitted 24/7. The ADAC whistleblowing system is available in both German and English; the language can be changed by clicking on the appropriate language in the top bar of the page.

To ensure that accessing the ADAC whistleblowing system cannot be traced either, ADAC will not provide you with a clickable link here but, rather, only with the internet address of the ADAC whistleblowing system. Please copy this address into the browser of an internet-capable end device. ADAC recommends using a private or public end device to ensure that any submission of information cannot be associated with you personally.

<https://www.bkms-system.net/ADAC>

What is the exact procedure for submitting and processing whistleblowing information?

Reporting process in the ADAC whistleblowing system:

The reporting process comprises four steps:

1. First, you are asked to read an informational text on the protection of your anonymity and to answer a security question.
2. On the next page, you are asked about the type of concern your report relates to. If you click on the little “i”, the information button beside each type of concern, you are given a brief explanation as well as examples of topics and circumstances that might fall under the respective category.
3. On the reporting page, you then formulate your report in your own words and answer questions on the circumstances by means of simple multiple-choice answers. Your free text can be up to 5,000 characters in length. This corresponds to a full DIN A4 sheet of paper. To support your report, you can also send a file of up to 5 MB with it. Please remember that documents may contain information about the authors. Once you have submitted your report, you will receive a reference number as confirmation.
4. Finally, please set up your own, secure postbox. In this postbox, you will receive from us a confirmation of receipt, feedback and responses to questions, as well as information about the progress of your report.

You can reach your secure postbox via the “login” button. Once you have read an informational text on the protection of your anonymity and answered a security question here too, you will be directed to the login area. Then enter your personal pseudonym/username and password that you chose yourself after submitting the report. This ensures that you can also remain anonymous throughout the dialogue.



As long as you do not provide any data that could be used to personally identify you, BKMS® Incident Reporting protects your anonymity by technical means.

ADAC assures you that it is interested only in the circumstances reported by you.

Processing of complaints:

Once you have submitted information via the ADAC whistleblowing system, you will be sent confirmation of receipt within six working days after submission.

ADAC Compliance Service GmbH will then check the report within twelve working days after the confirmation of receipt has been sent out. This includes checking that the information falls within the area of application of the ADAC whistleblowing system and, if this is the case, whether the information constitutes one of the types of concerns listed above.

If the information does not constitute one of the types of concerns listed above, you will be informed of this by ADAC Compliance Service GmbH with a brief explanation. You might be given the details of another point of contact or your information might be forwarded directly to the competent body. Information concerning the forwarding will be sent together with the explanation.

If the information constitutes one of the types of concerns listed above, it will be forwarded to the relevant ADAC organisational unit, i.e. the responsible specialist department of the affected ADAC organisation in each case. The responsibility may lie with different departments, depending on the situation. You will be informed of the forwarding of the information to the responsible ADAC organisational unit in your individual case.

After being notified of this, the ADAC organisational unit will contact you about the next steps within twelve working days. The communication will continue to be through the postbox, whereby anonymity will also continue to be guaranteed.

Following successful clarification of the circumstances, preventative and remedial measures will be formulated, depending on the outcome of the investigation. The expectations formulated by you beforehand in this regard will be taken into consideration.

You will be informed of the defined measures, as long as this does not infringe data protection regulations, confidentiality agreements or similar.

You will be informed via the postbox once the processing of the provided information is complete. Please note that we cannot specify a timeframe for this. The processing time crucially depends on the circumstances in each individual case and varies for this reason. The ADAC organisational unit may contact you again approximately six months after the case has been processed, so that you can jointly assess the measures taken in response to the whistleblowing information that you provided.



How are you protected against disadvantages or punishment as a result of reporting information about potential violations?

In addition to protecting all persons affected by the reporting of information, one of ADAC's main priorities is to protect the whistleblower themselves. This is ensured not only through the design of the ADAC whistleblowing system but also through the commitment to handle incoming reports confidentially and to take all necessary measures to protect you against any disadvantages resulting from the whistleblowing.

Both your reports and any personal data sent with them will always be treated confidentially. Subject to legal requirements, your identity will not be disclosed if you do not want it to be. Please note, however, that ADAC may be obligated to disclose your identity to the investigating authorities in the case of criminal prosecution or under local laws.

Only ADAC Compliance Service GmbH, the ADAC organisational unit responsible in the individual case and entrusted with the processing and, where necessary, those persons responsible for the decision-making and implementation of the pertinent measures have access to the information and any personal data submitted with it.

In addition, employees are made aware of the procedure and the handling of reported information in training on the Supply Chain Act and in the policy. Employees are also trained as part of the process for forwarding the reported information.

Nevertheless, if you are discriminated against, intimidated or disadvantaged or punished in any other way because of your whistleblowing of possible violations of human rights or environmental protection policy, this represents an infringement of the law in its own right and may have disciplinary or contractual consequences. The consequences in the individual case will be determined on the basis of the severity of the disadvantage or punishment.