

## **MVV-Procedure for indications and notes of possible misconduct (Whistleblower-Hotline – WBHL)**

With our Whistleblower Hotline (WBHL), we have established an early warning system to identify risks to people, the environment and our companies at an early stage. Furthermore, we want to offer affected persons access to possible remedies so that imminent violations or violations that have already occurred can be prevented, ended or minimized as quickly as possible.

We ensure that our WBHL complies with national laws and internationally recognized human rights and prohibit any reprisals or retaliation against whistleblowers.

Our WBHL is available to all internal and external persons, including and to the extent technically possible, for anonymous reporting. When an indication is submitted anonymously, no data is recorded that would allow conclusions to the identity of the person submitting the note. If the person providing the anonymous tip provides information that could be used to draw conclusions about his or her identity, the information will be treated confidentially.

### **1. Which indications / messages are covered by our WBHL**

Our WBHL covers indications and messages in connection with our business activities:

- the violation of human rights
- the violation of environmental obligations
- violations of the law, in particular those that are subject to criminal penalties or fines
- violations of EU regulations

Customer complaints about disruptions in connection with the processing of energy supply contracts etc. are not the subject of our WBHL. There are separate complaint options for this.

### **2. Recipients of the notes**

Information / notes on suspected cases can be reported to the following offices:

#### **Compliance Officer der MVV:**

Eva Hofmann-Rösch, T +49 621 290 1094 oder M +49 170 5711159

[eva.hofmann-roesch@mvv.de](mailto:eva.hofmann-roesch@mvv.de),

[compliance@mvv.de](mailto:compliance@mvv.de) or

[complaints reporting page](#)

MVV Energie AG, Luisenring 49, D-68159 Mannheim

#### **External lawyer of confidence**

Dr. Laura Borgel, T +49 69 770 196 78 or

[borgel@feigen-graf.de](mailto:borgel@feigen-graf.de)

Feigen · Graf Rechtsanwälte Partnerschaftsgesellschaft mbB, Liebigstr. 53, D-60323 Frankfurt

The mentioned e-mail addresses and the internet-based reporting portal can be reached at all times. MVV's compliance officer and the lawyer of confidence can be reached in person during normal business hours. Both are impartial and independent in the performance of their duties, have the necessary expertise and are sworn to secrecy.

### **3. What happens with your message / notice?**

Since we take information about suspected cases and violations seriously, we follow up every note unless the note proves to be obviously unfounded, in which case we refrain from further action.

At the request of the person making the notice, we will arrange a personal meeting to receive the note or related information in a confidential environment.

If the notice is reported to our lawyer of confidence, she will check the validity and forward it to our compliance officer.

#### **3.1. Confirmation of receipt**

After a notice is received, we will send an acknowledgement of receipt no later than seven days. On the internet-based reporting portal, the processing status of a tip submitted via the portal can be tracked.

#### **3.2. Editing the content of the note**

First, we check whether there is reasonable initial suspicion and whether the note is valid. In order to clarify and discuss the facts of the case and to obtain further necessary information, contact is immediately made with the person who provided the note, as far as possible. In this course, expectations for remedial and / or preventive measures with regard to the reported violation can also be discussed and recorded. If necessary for the clarification and processing of the note, other functional units responsible within the Group and affected in terms of content will be consulted and, if necessary, the authorities will also be involved.

In the case of anonymous reports, the person making the report will be asked whether he or she wishes to maintain and preserve his or her anonymity. This wish must be respected.

#### **3.3. Final assessment**

If a suspicion is not confirmed, we close the investigation for lack of evidence or other reasons.

In all other cases, the compliance office receiving the note initiates all necessary decisions; measures are taken appropriately and according to the state of knowledge and the threat situation.

Within three months at the latest from the date of acknowledgement of receipt, the person providing the information will receive feedback on the measures planned and those already

taken, as well as the reasons for them. However, no feedback will be provided as long as it could affect ongoing or pending inquiries and investigations or the rights of third parties.

### **3.4. Documentation**

We document every note in a permanently retrievable manner. Telephone and other verbal reports are documented by a summary of their content.

## **4. Protection of the whistleblower**

Protecting a whistleblower is our top priority.

We are committed to protecting whistleblowers from disadvantage or punishment as a result of a note and not to tolerate and consistently pursue retaliation / reprisals as a result of reports or tips.

Whistleblowers are subject to special protection, provided that the information provided by the whistleblower is accurate or the whistleblower at least assumed or was entitled to assume this in good faith. Accordingly, the whistleblower must have acted in good faith.

A whistleblower will also not be held legally responsible for obtaining or accessing information that he or she has reported or disclosed, unless he or she commits a crime himself or herself by obtaining or accessing it.

In addition, a whistleblower does not violate disclosure restrictions and cannot be held legally responsible for the disclosure of information made in a report or disclosure, provided that the whistleblower had reasonable cause to believe that the disclosure of the information was necessary to detect a violation.

However, the whistleblower's protection does not apply if the person intentionally or grossly negligently reported inaccurate information about violations.

## **5. Guarantee of confidentiality**

We guarantee confidentiality regarding:

- the identity of the person making the note, and
- the identity of the persons who may be the subject of the note, and
- the identity of other persons named in the note.

The identities listed here will only be known to the persons responsible for the respective receipt of notices or for taking follow-up action.

However, the identity protection does not apply,

- if incorrect information about violations is reported intentionally or through gross negligence, or
- law enforcement authorities demand the release and disclosure from us due to an order in an administrative proceeding or a court decision.

The identity of the persons who are the subject of a notice may also be disclosed if this is necessary as part of internal investigations to clarify the facts.

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