


	Integriertes Managementsystem	
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Responsible	Chief Compliance Officer
Approved	Chief Compliance Officer
Formal review	Governance Team
Area of application	Material scope: All companies of the CRONIMET Holding Group Personnel scope: All employees, all business partners, other stakeholders of the CRONIMET Holding Group and the public
Published on	Aug 15,2023
Valid as of	Aug 15, 2023
Superseded regulations	CRONIMET Guideline (Global) WHISTLEBLOWER SYSTEM (01 May 2020)
Responsible for implementation	Chief Compliance Officer
Retention period	10 years after expiry of the directive
Language version	Translation (English)
Revision cycle	on occasion, at least every 3 years


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1. Purpose

We want to ensure that as the CRONIMET Holding Group, we always comply with laws, our Code of Conduct, and our self-imposed corporate guidelines. Therefore, we encourage all employees, business partners and other stakeholders of the CRONIMET Holding Group as well as the public to inform us of any violations of the law to us. We are aware that in some cases, it may be challenging to report misconduct or violations of laws, the Code of Conduct, and our corporate guidelines. That is why we have established a web-based whistleblowing system to allow the target group of this guideline to anonymously report potential violations of laws, our Code of Conduct, or corporate guidelines. Our goal is to improve our business processes and minimize any negative consequences for the CRONIMET Holding Group and others.

This guideline aims to ensure adequate consideration of the legitimate interests of the CRONIMET Holding Group, whistleblowers, affected individuals, and the general public.

Furthermore, it is intended to ensure from a technical and organizational point of view that information on violations of laws, the Code of Conduct or corporate guidelines can be received in accordance with the requirements of data protection and data security and can be processed, saved and archived with the necessary confidentiality.

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If local regulations are stricter than the minimum standards set out in this guideline, the stricter rules shall apply in each case. If there is a conflict between relevant laws and this guideline, the affected CRONIMET Holding Group company shall inform the Chief Compliance Officer in order to resolve the conflict.

2. Definitions

2.1	Whistleblower	The person who reports an indication of "misconduct".
2.2	Person affected	The person who is accused of "misconduct".

3. Principle for recording of indications

As CRONIMET Holding Group, we attach great importance to integrity, compliance and an open corporate culture. We encourage you to report any violations, misconduct or unethical behaviour within our corporate group, as it helps us to fulfil our responsibility and minimize possible damages or risks. Reports can, but do not have to, be made anonymously and will be carefully reviewed and processed.

Every person within the mentioned target audience is authorized to submit reports, regardless of whether you are an employee of the Holding GmbH or a subsidiary of the CRONIMET Holding. This guideline does not obligate anyone to submit reports or provide information. However, if there are legal, contractual or other duties or obligations to provide information, these are not affected by the above paragraph.

3.1. Available reporting channels

We provide multiple reporting channels to make it easy for you to submit indications. In the case of employees, for example, this can be done via a personal conversation with the supervisor, an e-mail to the Compliance Department or by entering the information in the web-based whistleblowing system, or in the case of business partners, an e-mail to Compliance or by entering the information in the web-based whistleblowing system. However, the submission of indications is not limited to specific forms. In particular, indications can be provided in person, by telephone, or by e-mail.



Personal conversation




E-Mail: compliance@cronimet.de



By phone: +49 72195225-232



Whistleblowing system: [Fairplay Supporter](#)

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3.2. Relevant indications; good faith

The whistleblowing system is exclusively intended for receiving and processing reports of actual or alleged violations of laws, our Code of Conduct or company guidelines. This may include, for example, violations of environmental protection guidelines or violations of anti-corruption guidelines. In particular, it is not available for general complaints or for product and warranty inquiries.

Reports should only be submitted when the whistleblower genuinely believes that the information provided is accurate. The whistleblower is not acting in good faith if they are aware that the reported information is false. In case of doubts, relevant circumstances should be presented as assumptions, evaluations, or statements from other individuals rather than facts.

It is pointed out that a whistleblower may be criminally liable to prosecution if, against his/her better knowledge, he/she claims untrue facts about other persons or intentionally or grossly negligently provides incorrect information about violations.

Furthermore, it is pointed out that the whistleblower is obliged to refund the damage resulting from an intentional or grossly negligent report or disclosure of incorrect information.

3.3. Protection of whistleblowers

We ensure that every person using our whistleblowing system is protected from retaliation or discrimination. We guarantee that whistleblowers can remain anonymous if they wish to do so. All reports, including references to the whistleblower, will be processed confidentially and in accordance with applicable laws. Only those persons who are strictly necessary will be involved in processing the information. We sensitize all employees to the handling of confidential information and make clear the sensitivity of possible issues.

3.4. Protection of the person affected


We take the protection of the affected individual very seriously and make every effort to ensure that they are protected from retaliation or discrimination. Only those individuals who are strictly necessary will be involved in processing the reports. We sensitize all employees to the handling of confidential information and make clear the sensitivity of possible circumstances.

3.5. Dealing with incoming indications

When we receive an indication, we will investigate the matter. We check the information reported to us and, if necessary, take the relevant and appropriate measures.

The person providing the information receives a confirmation of receipt within 7 days at the latest and a response from the Compliance department within 3 months after the confirmation of receipt. Feedback

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will only be provided to the extent that it does not affect internal inquiries or investigations and the rights of the persons who are the subject of a report or who are listed in the report.

3.6. Confidentiality and data protection

The reported information will be treated confidentially and will only be accessed by persons who are authorized to process this information. We process personal data in accordance with the applicable data protection regulations.

All reported information, regardless of its truthfulness, can significantly damage the reputation of the person concerned, the whistleblower and/or third parties as well as the CRONIMET Holding Group. Therefore, we will handle them with utmost confidentiality in accordance with the obligations resulting from the data protection laws.

In addition to maintaining a properly and continuously updated record of processing activities, it is necessary to document in writing which individuals are authorized to access the reported information and associated data, as well as their rights within the scope of data processing. These individuals must be obligated to maintain strict confidentiality, going beyond any legal requirements.

3.7. IT and data security


We take comprehensive IT and data security measures to ensure the security of the whistleblowing system and the reported data.

The IT solution used to receive and process indications was reviewed and approved by the Information Security Officer (ISO), the Chief Compliance Officer (CCO) and the Data Privacy Officer prior to use.

Our service provider for the web-based whistleblowing system regularly monitors and updates the IT system to ensure the highest security standards.

4. Abbreviation index

Abbreviation	Meaning
ISO	Information Security Officer
CCO	Chief Compliance Officer

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5. Additional applicable documents

Roxtra ID	Name
26611	Company agreement CR Ferroleg.

6. Change log

Version	Modifications	Created
001/12.2021	Initial Version	Caroline Hussels
002/05.2023	Follow-up version	Anna Ruf