


Document Name Berichtsweg Compliance	Created By: B. Hensgen	Approved By /Date B. La Gaetana	 Aqseptence Group
Document Version 01	Checked By: Th. Jacobi	Issue Date 17.12.2021	

Reporting channel Compliance

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Zusätzliche Informationen / Additional information:

Valid for:
All Entities


Anhang / Appendix:

Status:
Valid

Revision History

Rev.	Revision Date	Created by	Approved by	Description
001		Hensgen	La Gaetana	Initial Document
	Description latest Revision:			

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Reporting channel Compliance

The following reporting channels are followed for all Compliance measures:

I. Annual Report


The Chief Compliance Officer reports annually to the CEO of Aqseptence Group GmbH on all measures taken in the last year in the area of compliance. This report contains the reports on the whistleblower system, internal investigations carried out as a result or for other reasons, the renewal of risk analyses and the decision on updating/changing or setting up new specific compliance processes.

II. Internal investigations

Internal investigations are subject to the following reporting path, independent of the annual report:

1. report whistleblower system / other anomalies
2. in case of a tip: acknowledgement of receipt by Compliance Officer within 7 days.
3. validity check by Compliance Officer
 - If no violation / problem is visible, corresponding memo, information to Chief Compliance Officer; filing.
 - If a violation is conceivable, report to Chief Compliance Officer; prepare internal investigations including listing of internal and, if necessary, external experts to be involved. Stichhaltigkeitsprüfung durch Compliance Officer
4. decision on conduct of proposed internal independent investigation by Chief Compliance Officer; information to CEO.
 - If tip received, status to whistleblower by Compliance Officer.

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- Decision on reporting to government authorities

5. after completion of the investigation, information to and final decision by the Board of Directors.
 - If necessary, inform whistleblower through Compliance Officer
 - Disciplinary action, if any, for identified violation through HR
 - If necessary, set up/change internal guidelines to prevent such cases in the future.

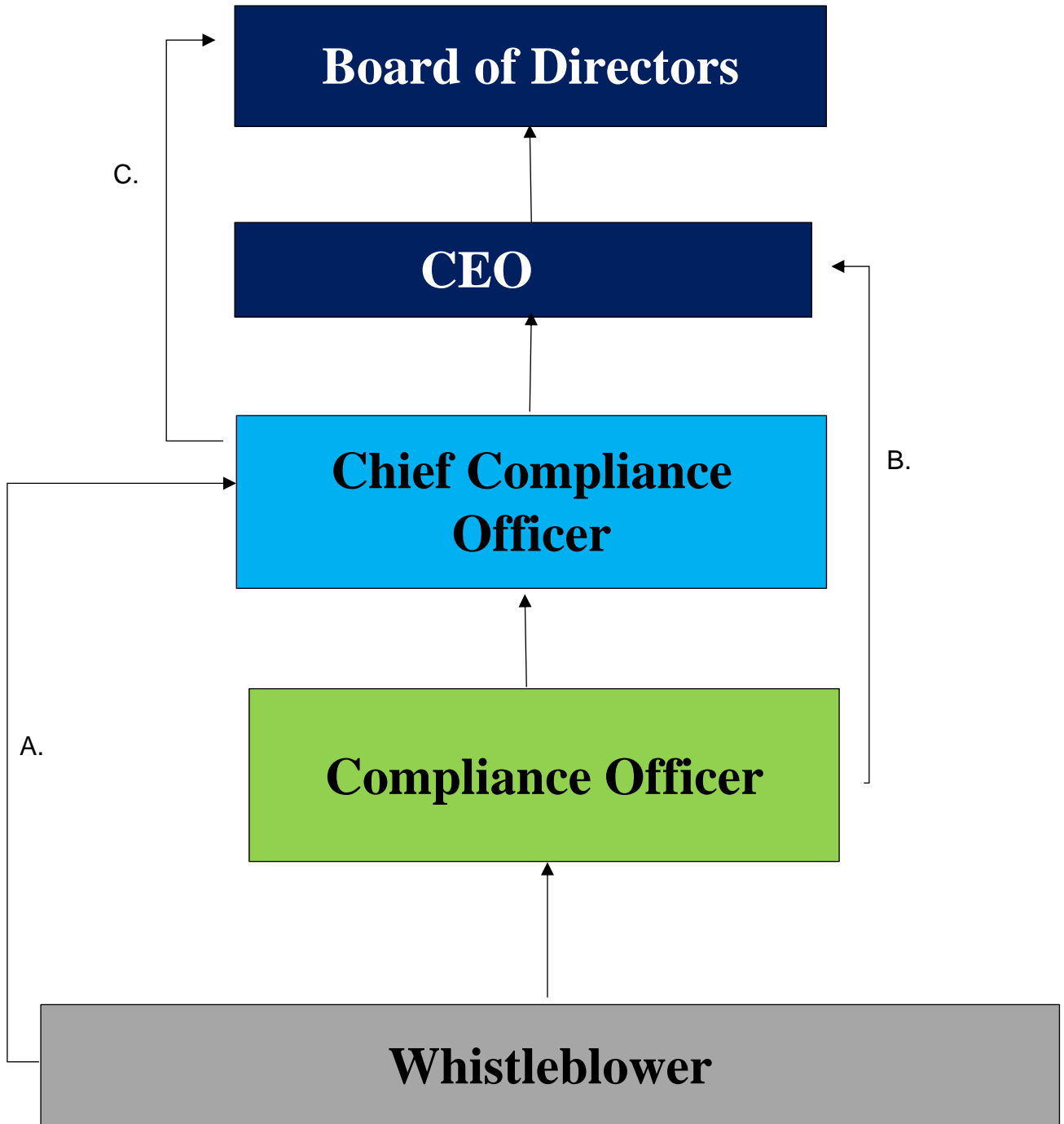
This reporting channel must be deviated from if the suspicion is directed against one or more persons in the reporting chain:

- A. In the event of suspicion against the Compliance Officer, the report shall be made to the Chief Compliance Officer
- B. The Compliance Officer reports directly to the CEO in the event of suspicion against the Chief Compliance Officer
- C. The Chief Compliance Officer shall report to the non-concerned members of the Board of Directors suspicions against one or more members of the Board of Directors. In this case, reporting to the CEO is only possible if all other members of the Board of Directors are suspected. Otherwise, even without suspicion against the CEO, the entire non-affected Board of Directors must be informed.
- D. In the event of suspicion against the full Board of Directors, the Chief Compliance Officer shall report the suspicion to the authorities upon completion of the internal investigation.

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Berichtsstruktur:



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