

# “SpeakUp” -

## Frequently asked questions and answers (FAQs)

Version: January 2021

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Please note:

For superior readability, the simultaneous use of masculine, feminine and other forms of language has been dispensed with. In the interests of equal treatment, personal designations apply to all genders. The abbreviated form of language is for editorial reasons only, and does not imply any bias.

## "SpeakUp" - How to leave a message

### 1 How do I leave a message?

You can leave a (new) message using the "SpeakUp"<sup>®</sup> system by telephone or via the internet.

We recommend that you write down the message beforehand; this allows you to check whether you want to pass the information on in this way, and to ensure that the message also contains the necessary information so that the recipient is able to identify the reported grievance and/or misconduct clearly and unambiguously.

"SpeakUp" telephone: +49 800-1801733

"SpeakUp" internet: <https://www.speakupfeedback.eu/web/simon/de>

You will then be asked to enter the following access code:  
20535

Choose the language in which you want to leave your message.

Please have a pen ready when you leave a message. You will be given your personal 6-figure case number, which is generated by a random number generator.

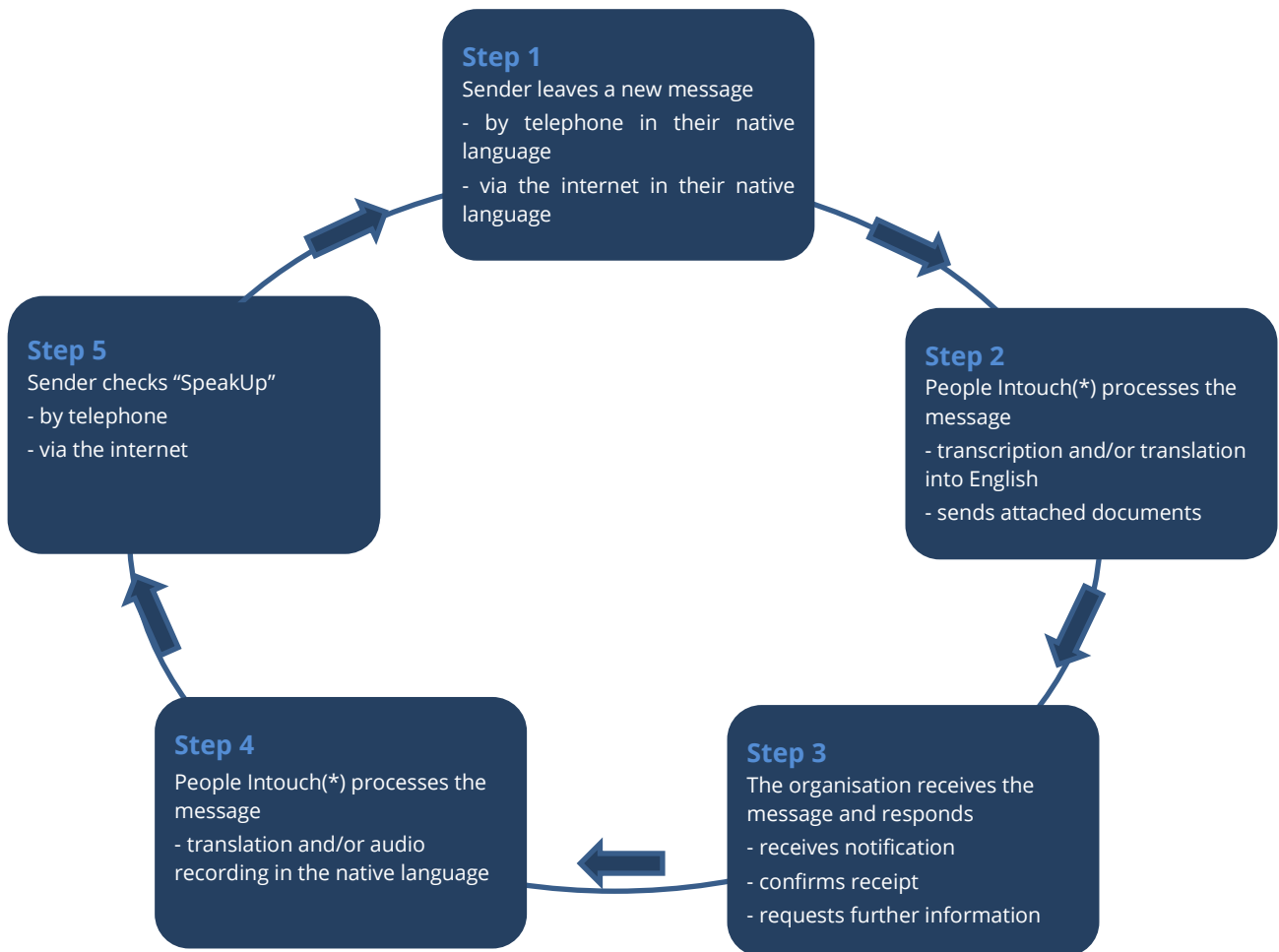
It is IMPORTANT for you to remember this number if you want to access the reply to your message at "SpeakUp" at a later time.

When using the "SpeakUp" telephone, please speak very clearly, and spell out any names and/or places to which you make reference in your message.

After finishing your message, all you have to do is hang up.

If you use the "SpeakUp" internet site, you can enter your message either using the keypad/board or by "copy/paste". You can also upload additional documents which relate to your message.

Once you have finished your message, click on "Send message"; a screen will then appear with your case number and the message, which you can then print out.



(\*) People Intouch is the service provider commissioned by the company

### What happens in the meantime?

Once you have finished your telephone call or sent your message, the operator of the "SpeakUp" platform (People Intouch) will translate your message into English as required (does not apply to messages in German).

If it is a (telephone) voicemail message, the recording will initially be logged word for word (in writing). The audio recording itself will NEVER be disclosed to INDUS (the parent company of the group) or the company concerned.

As soon as the translation has been completed, it will be sent to the Compliance Officer of INDUS Holding AG together with the transcript of the original message. The legal department of INDUS Holding AG assumes responsibility for the monitoring of incoming messages on behalf of the company, insofar as this is necessary.

After an initial assessment of the matter by the Compliance Officer of INDUS Holding AG, s/he will respond to the message. The reply takes place, once again, via People Intouch. People Intouch will translate the **reply into the same language as your** original message and send it to you via "SpeakUp". If your original message was left over the telephone, People Intouch will also record the reply and send it as a voicemail message.

### How do I get a reply?

A reply should be available to you in "SpeakUp" within one week. You access the reply in the same way that you left the message. For this purpose, you use the aforementioned login data.

PLEASE NOTE: It is possible to change the communication via "SpeakUp" from the telephone to the internet at a later time, but it is not possible to change from the internet (back) to the telephone.

If you would like to listen to your reply on the telephone, you will be prompted to dial "1" and enter your case number. Once you have listened to the reply (or read it in the case of an internet message), you can leave additional follow-up messages. However, this does not have to take place immediately; you can also log out and/or hang up and do this later if required.

If you have not yet received a reply, please rest assured that your message and the matter at hand will be dealt with, and that you will receive a reply within a few working days. We therefore recommend that you check whether you have received a reply on a regular basis.

## 2 Frequently asked questions about the system

### 2.1 What is "SpeakUp"?

"SpeakUp" is a service (communication tool) with which the employees (including temporary workers), customers and suppliers of the INDUS Group can inform the company of serious information (e.g. criminal offences) of which it would otherwise probably not be aware. This takes place by telephone or via the internet (secure website); there is no personal intermediary (an "operator").

A message can also be left completely anonymously.

### 2.2 What should "SpeakUp" be used for?

We wish to encourage anyone who has knowledge or reasonable suspicion of material misconduct/a grievance (infringement of the law, or unethical conduct which is contrary to our Code of Conduct) to report it.

We also encourage the reporting of such matters through the known and established reporting channels. These are, for example,

- a person of trust in the company,
- the human resources department,
- the works council,
- the management team,
- the company suggestion/reporting system,
- the compliance office.

"SpeakUp" should be understood as being a "last resort", so to speak, when all other notification and reporting channels have been exhausted or cannot be considered for a message for other reasons.

### 2.3 How does "SpeakUp" work?

Telephone: You call a free-phone number, enter the access code and leave your message. At no time during the call will you speak to an "operator". You will simply receive recorded instructions which guide you through the process.

A reply should be available to you in "SpeakUp" within one week. You access the reply in the same way that you left the message; to do so, you use the same login data. Once you have listened to the reply, you can leave additional follow-up messages. This does not have to take place immediately; you can also hang up and do this later if required. There is no upper limit; an electronic dialogue of this kind can therefore be repeated as often as necessary.

**TIP:** Write down your message beforehand; this allows you to check whether you want to pass the information on in this way, and to ensure that the message also

contains the necessary information so that the recipient is able to identify the reported grievance and/or misconduct clearly and unambiguously.

Internet: Go to the "SpeakUp" website (via hyperlink or by entering the URL), select your country, enter the access code (you will be given this on the website) for the company concerned and leave your message.

A reply should be available to you in "SpeakUp" within one week. You access the reply in the same way that you left the message. For this purpose, you use the same login data. Once you have listened to or read the reply, you can leave additional follow-up messages. This does not have to take place immediately; you can also hang up and/or log out and do this later if required. There is no upper limit; a dialogue of this kind can therefore be repeated as often as necessary.

#### **2.4 Who operates "SpeakUp"?**

"SpeakUp" is operated by an external service provider, People Intouch, an independent company which is based in Amsterdam, Netherlands. It is responsible for processing all the incoming messages.

The "SpeakUp" service is currently used by several well-known companies, such as BMW, Roche, IKEA and Randstad.

#### **2.5 Is "SpeakUp" difficult to use?**

The answer to this question is "no". Simple (voice) instructions guide you through the web-based process or the telephone menu.

#### **2.6 Can my identity be revealed?**

The recipient of the telephone message (in step 1, the Compliance Officer of INDUS Holding AG) receives a translated word-for-word transcript of your voice message. This means that you have complete control over the content of your message. If you include your contact information in the message, this will be forwarded to the Compliance Officer via "SpeakUp". If you do not provide this information, neither People Intouch, nor INDUS Holding AG, nor the company affected by your message will be able to determine your identity.

As a contractual partner of People Intouch, INDUS Holding AG has also provided assurance that it will not attempt to find out the identity of persons who leave anonymous messages or reveal the disclosed identity to a witness or anyone accused in connection with the report.

Exceptions only apply in the event of a request for publication on the part of the public authorities on the basis of a compelling legal reason. In this case, the data will not be forwarded to either INDUS Holding AG or to the company concerned by People Intouch.



## **2.7 Will my voicemail message be forwarded to the respective company?**

No. The "SpeakUp" service is operated by People Intouch, an independent company which will log your message in writing and translate it (as required). Only the transcript (and its translation, if any) will be forwarded.

**TIP:** If you feel uncomfortable leaving a voicemail message for this reason, ask someone else to record the message for you or make use of the option of leaving a written message over the internet.

## **2.8 Can the company concerned trace my connection data?**

No. The "SpeakUp" service is operated by the company People Intouch; neither INDUS Holding AG nor the company concerned have access to the connection data. Telephone data and IP addresses are not made available to either INDUS Holding AG or the company concerned.

It may be the case, however, that this connection data is tracked if you use a company phone or computer for the reporting purposes.

**TIP:** You can use a public telephone or another untraceable telephone or computer.

## **2.9 What happens to my voicemail message?**

Upon confirmation of receipt of the transcript (and translation) by INDUS Holding AG, People Intouch will delete the recording immediately.

## **2.10 Can my confidentiality (my anonymity) be lifted?**

In the event that a message is left which includes the threat of a criminal or violent act, INDUS Holding AG or the company concerned may request that the recording of the voice message is not deleted and that it is forwarded to the law enforcement authorities. Even in such a case, however, the recording will not be transferred to INDUS Holding AG or the company concerned.

### **2.11 Who pays for my telephone call?**

The "SpeakUp" service is generally available as a free-phone telephone number.

**IMPORTANT:** In exceptional cases, costs may be incurred (with some mobile telecoms providers, for example).

### **2.12 Is there a time limit on my message?**

No, but after 7 minutes of talk time, you will receive a message asking whether you want to continue with the call.

**TIP:** Try to get to the point in your message as best you can.

### **2.13 What can I do if "SpeakUp" is not available by telephone?**

If you have tried calling with a mobile phone, please try a landline instead. Experience has shown that this is the safest way to reach the "SpeakUp" service by phone. If you also have problems reaching "SpeakUp" from a landline, you can send an email to:

SpeakUp@peopleintouch.nl.

Your name, address or other sensitive data will not be passed on to INDUS Holding AG or the company concerned under any circumstances.

### **2.14 How quickly will my message be forwarded to the responsible persons?**

Your message or the transcript of your voicemail message (with translation, if necessary) will be forwarded within one working day.

### **2.15 Who will receive my message?**

The recipient of your message is the Compliance Officer of INDUS Holding AG. The legal department of INDUS Holding AG assumes responsibility for the monitoring of incoming messages on behalf of the company, insofar as this is necessary.

The response to the matter is then determined subsequent to this initial assessment.

According to the seriousness of the allegation, the group of persons affected, and the area of law, the further assessment will be carried out directly by the Compliance Officer of INDUS Holding AG, or the report will be passed on to the responsible office of the holding company or investment group concerned (usually the management of the direct INDUS holding or, if available, the responsible Compliance Officer of the holding company).

External experts, such as lawyers, may be called in for the further examination of the grievance. A reporting duty may arise if there is sufficient suspicion of a criminal offence.

### **2.16 I would like to remain anonymous, but still get a reply. How can I do that?**

You will receive a personal case number from "SpeakUp" which you MUST be sure to remember. This number will give you access to the reply to your message when you log back into the "SpeakUp" service.

### **2.17 How quickly will I receive a reply?**

The goal is for you to receive an initial reply within a week. If you have not yet received a reply after this time, we recommend that you try again after a few days. However, you also have the option of leaving another message under the same case number.

### **2.18 When can I access "SpeakUp"?**

The "SpeakUp" service is available by telephone 24 hours a day, every day of the year. Each country (within the INDUS Group) has its own free-phone telephone number and access code.

### **2.19 Am I also able to leave a message in my native language?**

You can leave a message in the designated languages of the respective INDUS holding companies. You will receive your replies in the same language in which you left your message.

### **2.20 Am I also able to leave documents?**

If you use the "SpeakUp" service via the internet, you can upload (electronic) documents to "SpeakUp" in addition to a message.

If you have submitted a telephone message, you can log in via the internet with your case number (to do this, click on the "if you already have a case number" button) and upload your documents there.

**TIP:** If you wish to remain anonymous, make certain that the documents you upload do not contain any references to your identity.

### **2.21 What happens if I forget my case number?**

If you have forgotten your case number, please leave your message again under a new case number. Please use the new case number for all future communication.

### **2.22 I don't know where to leave a message. Where can I find this information?**

You can usually find this information on your company's website.

### **2.23 What is personal data, and how is my personal data protected when I leave a message using "SpeakUp"?**

Personal data is (in brief) information that can (directly or indirectly) identify a person referred to in your message (for example, their name, address, telephone number, a photo, etc.). The processing of this data by People Intouch (the operator of "SpeakUp") is carried out according to the provisions of the GDPR.

#### **2.24 What rights do I have if I leave a message using "SpeakUp" which contains personal information?**

As the contractual partner of People Intouch, INDUS Holding AG is responsible for the compliance with your rights according to the GDPR.

### 3 Tips for leaving a message in "SpeakUp"

- Write down your message beforehand; this allows you to check whether you want to pass the information on in this way, and to ensure that the message also contains the necessary information so that the recipient is able to identify the reported grievance and/or misconduct clearly and unambiguously.
- If you feel uncomfortable that your voice could be recognised if you leave a voicemail message, ask someone else to record the message for you or make use of the option of leaving a written message over the internet.
- You can use a public telephone or another untraceable telephone or a computer.
- Clear the cache memory of your browser after using "SpeakUp".
- If you wish to remain anonymous, make certain that the documents you upload do not contain any references to your identity.
- Make sure that you don't forget your personal case number. Only you know this number.
- Before you leave your message, consider whether or not you wish to do so anonymously.
- Before you leave your message, think about which information you want to provide and in which level of detail. The information should be to the point such that it allows the recipient to make an objective assessment.
- Try to get to the point in your message as best you can. To do this, it is helpful to provide meaningful and unambiguous information about the matter (such as the precise location, the date and time, invoice numbers). Electronic documents can be uploaded.
- Names of people may also be important, however PLEASE only mention them if it is imperative to the understanding and resolving of the issue.
- Stick to the facts when providing information about an individual person. Refrain from providing information which could affect that person's privacy (such as their religious affiliation or mental and physical condition). If a name is required, please spell it out when leaving a voicemail message.

## 4 Contact details

### **Karl SIMON GmbH & Co. KG**

Free phone number: +49 800-1801733

Web address: <https://www.speakupfeedback.eu/web/simon/de>

access code: 20535

### **Compliance Officer of INDUS Holding AG**

compliance@indus.de