

BOLL & KIRCH Compliance Program Group Guideline Compliance Organization

For the success of the **BOLLGROUP** it is essential that all companies within the Group are managed responsibly according to business ethics principles and in accordance with the laws and rules of fair competition.

Compliance with legal requirements, in particular statutory provisions, which infringement causes criminal or administrative penalties, and compliance with Group Guidelines in the BOLLFILTER Compliance Program, are of paramount importance for Boll & Kirch Filterbau GmbH and its affiliated companies ("**BOLLGROUP**"). Compliance with the Compliance Guidelines is the responsibility of all members of the supervisory bodies and all employees of the **BOLLGROUP**. The specific organizational responsibility for compliance is defined by this Group Guideline.

1. Compliance Organization

Managing Director(s)

The observation of the management function in the area of compliance is the responsibility of the Managing Director(s) and the Compliance Director of the **BOLLGROUP**. The responsibility of the Managing Director(s) includes in particular the adoption of resolutions with regard to compliance issues, the decisions on measures to clarify and punish compliance infringements, the reporting to the shareholders and the Supervisory Board on compliance cases, measures taken and the further development of the Compliance Guidelines.

Compliance Officer

The function of the Compliance Officer, appointed by the Managing Director(s), is performed by the Director Finance, Controlling and Compliance. The Compliance Officer has organizational responsibility for implementing and updating the guidelines issued by the Managing Director(s), and serves as a point of contact for questions and suggestions regarding the BOLLFILTER Compliance Program as well as for notifications of any violations of the compliance regulations. In case of violations the Compliance Officer carries out clarification and disciplinary measures.

In case of information received through the whistleblower system the Compliance Officer is supported by the Director HR. Both together serves as the Compliance Committee.

Supervisory Board

The Supervisory Board is responsible for monitoring the compliance program and compliance measures within the **BOLLGROUP**. In order to perform this function, the Supervisory Board is, on the one hand, regularly reported on information received via the whistleblower system and the resulting measures. And on the

other hand with regard to changes in the compliance organization and the compliance program.

Compliance responsible person BOLL & KIRCH subsidiaries

The overall responsibility in the subsidiaries of the BOLLGROUP in regard to compliance issues, their monitoring and (if applicable) – in consultation with the Compliance Officer of the BOLLGROUP – training is the responsibility of the General Manger of the companies.

2. Questions, suggestions and contact persons

For questions and suggestions relating to this Guideline and its observation the employee's superior and the Compliance Director of BOLL & KIRCH, are available. In case of doubt it is essential that the correct procedure is agreed with one of these two persons.

Kerpen, December 2022



CEO



Director Compliance