

**Anonymous Grievance Procedure**  
**Improvement Programm**

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**Création Gross GmbH & Co. KG**  
**Houbirgstraße 7**  
**91217 Hersbruck**  
**Deutschland**

and

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**Houbirgstraße 7**  
**91217 Hersbruck**  
**Deutschland**

hereinafter referred to as "Création Gross"

**PREAMBLE**

In order to comply with the legal requirements of the Hinweisgeberschutzgesetz (HinSchG) Création Gross has established a grievance procedure - Improvement Programm.

Création Gross complies with the law and stands for integrity. Every employee must comply with the legal requirements, the company agreement and other Création Gross regulations that are relevant to him or her.

Executives of the company have a special role model function in this respect. Any employee who violates the applicable rules and laws while on duty must expect sanctions under labor law, claims for damages by the employer or even criminal charges.

With the establishment of the grievance procedure, Création Gross is setting up a platform for anonymous notification of optimization opportunities and reporting of violations of legal regulations, specifications from the company regulations or other Création Gross guidelines.

In order to ensure a uniform, professional and transparent approach to dealing with tips, Création Gross has set up the grievance procedure, which is available to both employees and external parties.

**ANONYMOUS GRIEVANCE PROCEDURE**



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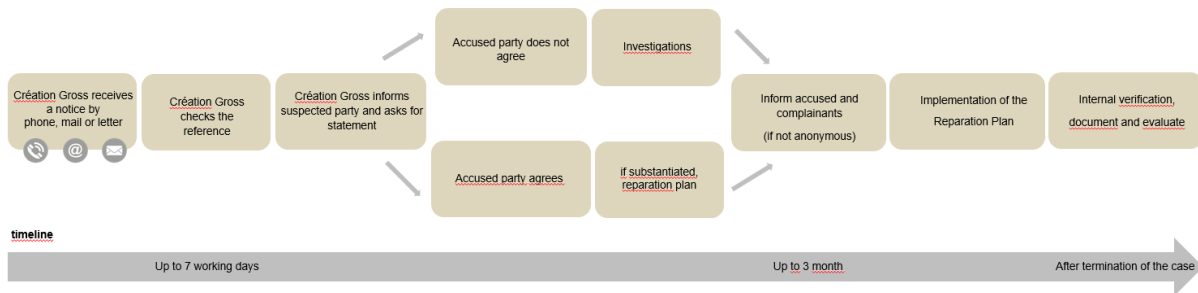
E-Mail: [improvement@creationgross.com](mailto:improvement@creationgross.com)

The information can be provided anonymously or by name. If anonymity is not already ensured, the wish for anonymity should be explicitly stated when the information is provided. Regardless of which channel is used: The notice will be treated confidentially.

In general, only information required to clarify the tip will be forwarded to persons or departments. In addition, the principle applies that there will be no negative consequences for the whistleblower - regardless of whether the notice is confirmed or not.

Création Gross undertakes to process the notice within 7 working days after receipt.

## Flowchart:



Furthermore, information can be sent to the external reporting office of the German Federal Ministry of Justice (BMJ). The following channel has been established for this purpose:

[https://www.bundesjustizamt.de/DE/MeldestelleBund/MeldestelleBund\\_node.html](https://www.bundesjustizamt.de/DE/MeldestelleBund/MeldestelleBund_node.html)

## WHAT INFORMATION IS NEEDED

In order to be able to process the notice, the person employed by Création Gross must understand exactly what has happened. It is therefore important that the facts of the matter are described as precisely as possible and in a way that is comprehensible to third parties.

These questions can help:

- What happened?
- Who is involved (names of persons with function or position)?
- Where did it happen?
- When did it happen (e.g., dates, time periods)?
- What is the nature of the breach?

This doesn't mean you have to answer all the questions. But the more information that is shared, the more likely it is that you will be able to fully clarify the notice. It should be noted that if the information is provided anonymously, it is no longer possible to ask questions about the facts of the case, which may make it more difficult or impossible to clarify the information.

## WHY EVERY REPORT MATTERS

We would like to expressly encourage the reporting of violations of legal regulations, the requirements of the company regulations or other Création Gross guidelines - in the interest of honest employees and for the protection of the company.

This applies in particular to suspected violations of human rights, corruption and fair competition. Because in the worst case, this can threaten the existence of the company. We also appeal to our business partners and customers to report violations that affect Création Gross companies or employees and are related to our business activities.