

MMC Hartmetall GmbH · Postfach 23 62 · 40646 Meerbusch

Attention of
Business Partners of MMC Hartmetall GmbH (MHG)

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Whistleblowing System

Dear business partner,

We are pleased to inform you about our internal Whistleblowing system at MMC Hartmetall GmbH (MHG).

Compliance - i.e. adherence to rules and laws as well as social norms - is of essential importance to us as a subsidiary of Mitsubishi Materials Corporation. We highly value integrity and transparency, which is why we see whistleblowing as an early warning system that enables us to identify and correct misconduct.

In this way, significant damage to the company can be avoided and prevented and the quality of our processes can be continuously improved. Therefore, we explicitly welcome reports that bring to our attention a grievance or a misconduct within our company or in the upstream supply chain.

No whistleblower should be afraid to make a report because of possible negative consequences. We recognise the value of your report and appreciate your contribution to our corporate social responsibility as a whistleblower. As such, we commit to providing you with the highest level of protection and confidentiality.

We are determined to break with tradition and question our existing processes. In doing so, we count on your support.

Yours sincerely,



Tetsuo Yamazumi
Managing Director / President



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What kind of whistleblowing can be done?

Through our whistleblowing system, you can bring to our attention not only whistleblowing under the EU Whistleblower Protection Directive 2019/1937 and the German Whistleblower Protection Act, but all legal, social and other compliance-related grievances in the business of MHG and its suppliers.

1. Examples of legal grievances

- Violation of human rights
- Violation of environmental regulations
- Corruption, bribery, acceptance of benefits
- Fraud, theft, embezzlement, deception, personal enrichment
- Discrimination, unequal treatment in the application process, etc. (violations of the General Equal Treatment Act/AGG)
- Data protection violations
- Accounting and bookkeeping violations
- Violation of employee protection regulations (incl. health and safety at work)
- Violation of export control regulations (embargoes, sanctions, etc.)
- Violations of competition or antitrust law (e.g. agreements with competitors, unfair business practices)
- Violation of contractual obligations
- Infringement of intellectual property (copyrights, trade secrets, patents, etc.)

2. Examples of social grievances

- Abuse of power
- Sexual harassment
- Other forms of harassment (verbal, physical or psychological)
- Bullying
- Racism, discrimination, unequal treatment among colleagues, by a superior or towards business partners
- Threats, coercion
- Compulsion, assault

3. Examples of other compliance-related grievances

- Violation of internal regulations and work instructions
- Violations of the Code of Conduct
- Defects in product design or material selection that may result in damage or problems in the use of the product

Which reports will not be processed?

Abuse of the whistleblowing system will not be tolerated. Grossly negligent or intentional false reports are not subject to whistleblower protection and may also lead to the whistleblower being liable for damages.

Complaints of a commercial and technical nature do not fall within the scope of our whistleblowing system and are therefore not handled by our contact point. For these types of reports, please contact your respective contact person from our customer service team.

Who can be a whistleblower?

- Employees (including former employees), job applicants, temporary workers of MHG.
- Business partners such as customers, suppliers, service providers, etc. who have business dealings with MHG
- Other stakeholders such as non-profit organisations, municipal or environmental associations, etc.

How do I make a report?

Reports can be made online or by telephone.



Online: (in German, Turkish or English)
[Whistle-Report Online](#)

Telephone: (in German or English; Mo-Fr 9 a.m. to 5 p.m. CET)

From Germany: +49 800 3800 999

From other countries: +49 699 9998 839

If you access the online reporting tool or call the telephone number, you will be guided through a questionnaire to ensure that your report contains all relevant information.

Your report will be processed by specifically trained employees of MHG. In their function, they are independent of instructions and will always treat the information received confidentially.

Whether or not you want to disclose your identity is at your own discretion. If you submit a "named" report, you can receive notifications to your e-mail account whenever there is a status update in relation to your report.

But even if you want to stay completely anonymous, the contact point members can communicate with you through the online system. When filing your report, you will receive a unique code and a PIN so that you can log into the portal and follow-up on the status of your report anytime.

As an alternative to the MHG whistleblowing system, you can also use the publicly accessible external reporting channels, e.g.:

1. [Federal Cartel Office \(Germany\)](#)

2. [North Rhine-Westphalia State Commissioner for Data Protection and Freedom of Information](#)

3. [BfJ Federal Office of Justice \(Germany\)](#)

How is the whistleblower protected?

„Whistleblower protection is corporate protection“ - following this guiding principle of the Federal Ministry of Justice, we place special emphasis on protecting the whistleblower from reprisals as well as the confidentiality of his or her identity.

This is not only in the interest of the whistleblower, but also in our own interest in a functioning early warning system. We only pass on the information received if and to the extent that this is absolutely necessary for the clarification of the facts.

Whistleblowers do not have to fear any disadvantages of a business, disciplinary or other nature.

What happens after the report?

You will receive an acknowledgement of receipt within 7 days of receipt of your report. The report is then first subjected to a plausibility check, followed by the determination of appropriate follow-up measures.

Follow-up measures can be, for example:

- Initiation of internal investigations, questioning of named witnesses.
- Taking measures to remedy the problem (e.g. re-training of staff).
- Passing the case on to the competent authority, self-reporting, etc.
- Closing the case due to lack of evidence or other reasons.

If necessary, you can be contacted by the contact point to clarify open questions or uncertainties.

At the latest after three months (calculated from receipt of the confirmation of receipt), you will receive feedback on the follow-up measures planned or already taken as well as the reasons for them. In accordance with the German Whistleblower Protection Act, all documentation of the procedure will be deleted 3 years after the conclusion of the procedure.