

FAQ regarding ombudsperson / whistleblowing system

1. What does the ombudsman do?

The ombudsman's main responsibility is the confidential receipt of information on business-related crime, as well as illegal business practices and regulatory breaches to the detriment of the company or contrary to the German Banking Act (Kreditwesengesetz, KWG). The ombudsperson offers whistleblowers who do not wish to contact the party responsible within the company (Anti-Money Laundering Officer or their deputy) an additional, external contact who is bound by legal professional privilege and therefore obliged to maintain confidentiality. Based on many years of professional experience, the ombudsman independently evaluates the evidence provided for relevance to the company. If the ombudsman reaches the conclusion that the suspicion needs to be investigated further, then the ombudsman passes on the file to the Anti-Money Laundering Officer (AMLO) without revealing the whistleblower's identity. The whistleblower's identity will be disclosed to the AMLO only at the whistleblower's request or with his express consent.

2. What constitutes a regulatory breach?

The ombudsman is responsible for the clarification and prevention of regulatory breaches such as:

- § 299 StGB: Bribery and the acceptance of bribes in business
- § 331 StGB: Acceptance of benefits
- § 332 StGB: Acceptance of bribes
- § 333 StGB: Granting of an advantage
- § 334 StGB: Bribery
- § 242 StGB: Theft
- § 246 StGB: Embezzlement
- § 264 StGB: Subsidy fraud
- § 265b StGB: Credit fraud
- § 266 StGB: Breach of trust
- § 263 StGB: Fraud
- § 263a StGB: Computer fraud
- § 17 UWG: Disclosure of business and trade secrets
- § 370 AO: Tax evasion
- Breaches with reference to potential human rights and environmental risks or breaches of duty in accordance with the German Supply Chain Due Diligence Act (LkSG)
- Breaches of relevant legal standards of the KWG

3. Who can contact the ombudsman?

The ombudsman can be contacted by all employees at DEG and also by external third parties.

4. What information does the ombudsman accept?

The main aim of involving the ombudsman is to clarify and prevent economic offences (see also point 2), but also other business-related offences connected to DEG's business or breaches of relevant standards of the KWG.

5. How is confidentiality ensured?

As a lawyer, the ombudsman has a duty of secrecy and will only disclose the whistleblower's identity to the compliance organisation of the relevant group company at the request and with the express consent of the whistleblower.

Information that is not released by the whistleblower is subject to a confidentiality obligation. Neither the company nor investigating authorities (police, prosecutors, courts) will have access to it. A lawyer who breaches his professional secrecy obligation can be punished under § 203 StGB.

6. How do I contact the ombudsman?

You can contact the ombudsman by telephone, email, fax or post. As a rule, an (in-person) conversation will take place after agreeing an appointment.

7. How is the information used?

The ombudsman will pass on legally pertinent information shared by the whistleblower to the AMLO.

The AMLO then uses a structured procedure to evaluate the situation, and the necessary (business) steps are agreed and implemented. If there are indications of criminal conduct, then – depending on the specific case – further (e.g. legal) steps will be taken by the company.

8. For what information does the ombudsman not bear responsibility?

The ombudsman is not an arbitration body for disputes with DEG or complaints from external third parties without criminal relevance. In such cases, please contact DEG's complaints management..