

We pioneer motion

Guidance

WHISTLEBLOWING SYSTEM

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Objective and Scope

This document serves as a guidance for the Schaeffler Group's Whistleblowing System, which empowers individuals, known as Whistleblowers, to report Compliance Violations, including concerns related to human rights, environmental issues, and other unethical or unlawful behavior involving Schaeffler, its personnel, or third parties, such as suppliers.

A Whistleblower can be any person—either an employee of Schaeffler or an external person—who provides reports of misconduct.

The Whistleblowing System is open to everyone and captures all reports regardless of whether the issue affects the reporter directly or indirectly.

Schaeffler is committed to global compliance with laws and regulations and adheres to its values as outlined in the Schaeffler Group Code of Conduct¹ and the Business Partner Code of Conduct².

To support these commitments, Schaeffler has established a central Whistleblowing System with multiple reporting channels.

Reports are processed by the Compliance Forensics & Investigations department at Schaeffler AG in Herzogenaurach, Germany, unless otherwise specified by national law or the Whistleblower's preference.

This document provides Whistleblowers with information on:






- The available central reporting channels, as well as references to local reporting channels where mandated by national laws.
- The categories of Compliance Violations that can be reported, including human rights and environmental concerns.
- The specific information that Whistleblowers should provide when making a report.
- The process followed after a report has been submitted.
- The measures in place to protect Whistleblowers and affected parties.

¹ [Code of Conduct | Schaeffler Germany](https://www.schaeffler.de/en/schaeffler-germany/group/code-of-conduct/)
(<https://www.schaeffler.de/en/schaeffler-germany/group/code-of-conduct/>)

² Schaeffler Business Partner Code of Conduct
(https://www.schaeffler.de/en/news_media/media_library/downloadcenter-detail-page.jsp?id=88048327#)

2 Reporting Channels

Schaeffler provides multiple central reporting channels for Whistleblowers, including an electronic system, phone, email, mail, and in-person reporting options. These channels are accessible to both employees of the Schaeffler Group and external parties.

	Electronic reporting system	SpeakUp (https://schaeffler.speakup.report/en-GB/speakup-line/home)
	Email to group level	investigations@schaeffler.com
	Phone Company access PIN: 129150	Brazil: Phone Number: +55 11 4700 8838 Language: Portuguese, English China: Phone Number: +86 4001201842 Languages: Chinese, English Singapore: Phone Number: +65 6403 7051 Languages: English, Malayan, Chinese, Tamil Germany: Phone Number: +49 800 181 8952 Languages: German, English United States: Phone Number: +1 669 288 7154 Languages: English, Spanish Further countries and languages: https://schaeffler.speakup.report/en-GB/speakup-line/phone-numbers Please eventually add country code.
	By mail to group level	Schaeffler AG Compliance Forensics & Investigations Industriestraße 1-3 91074 Herzogenaurach Germany
	In person	Chief Compliance Officer Compliance & Corporate Security Industriestraße 1-3 91074 Herzogenaurach Germany compliance@schaeffler.com

Excuse: Local Reporting Channels

Where mandated by national law, local reporting channels are available to ensure compliance with country-specific requirements.

In countries where a local reporting option exists, the electronic reporting system will guide Whistleblowers to choose between central and local reporting.

Further, Whistleblowers can submit reports directly to a designated Local Compliance Representative, who will manage the report according to local regulations.

A list of annexes outlining country-specific requirements, including local reporting channels, is available at the end of this document.

Except for in-person reporting, the listed reporting channels are available 24/7 and support all languages.

No matter which internal channel is chosen, all reports are logged within the central electronic reporting system managed by the Compliance Forensics & Investigations department.

For general inquiries about the reporting channels, particularly regarding the electronic whistleblower system, or for questions before submitting a report, the Compliance Forensics & Investigations department can be contacted at investigations@schaeffler.com, or you may reach out to your Local Compliance Representative.

3 Reporting Categories

Whistleblowers can report potential Compliance Violations, including concerns related to human rights³, environmental issues, and other unethical or unlawful behavior involving Schaeffler, its personnel, or third parties, such as suppliers.

This includes any actions by Schaeffler employees or third parties (like suppliers or customers) that could break laws or regulations, possibly resulting in legal trouble or fines for Schaeffler. Such actions might also damage the company's assets, hurt its reputation, or go against the values in Schaeffler's Code of Conduct or other policies.

Personal grievances related to salary, promotions, or disputes among employees or with managers over contractual obligations, processes and workplace regulations are generally not considered Compliance Violations.

³ Such as forced labor, child labor, discrimination (incl. harassment), freedom of association, minimum wage etc. For further details see Chapters 4 and 5 of the Schaeffler Code of Conduct (<https://www.schaeffler.de/en/schaeffler-germany/group/code-of-conduct/>) or Chapters 3 and 4 of the Schaeffler Business Partner Code of Conduct (https://www.schaeffler.de/en/news_media/media_library/downloadcenter-detail-page.jsp?id=88048327#)

4 Content of Whistleblower Report

To ensure effective processing of reports, Whistleblowers should provide detailed information, including:

- A clear description of the incident (what happened, when and where it occurred).
- Information about the individuals involved, such as witnesses, perpetrators, or affected parties.
- Any evidence or documentation that supports the report, like emails, photos, or other records.
- Whether the Whistleblower wishes to remain anonymous or is willing to provide contact details for follow-up.

The electronic reporting system allows the upload of supporting documents and offers a secure mailbox for encrypted communication with the responsible reporting office.

5 Procedure following a Whistleblower Report

The Compliance Forensics & Investigations department, or the Local Compliance Representative where applicable (hereafter referred to as the responsible reporting office), conducts a pre-analysis of the report.

If a potential Compliance Violation appears evident, the responsible reporting office will proceed with the investigation.

During the investigation process, the responsible reporting office may collaborate with other internal departments to gather the necessary support and expertise to address potential Compliance Violations. This collaboration strictly adheres to data protection and whistleblower protection regulations, as well as the need-to-know principle.

5.1 Submission of a report

The procedure starts when a Whistleblower submits a report through one of Schaeffler's reporting channels. No matter which internal channel is used, the responsible reporting office logs the report in the electronic whistleblowing system.

5.2 In-person meeting

If the Whistleblower requests an in-person meeting, the responsible reporting office will schedule it within a reasonable timeframe, ensuring it takes place no later than 14 days after the request.

5.3 Confirmation of the receipt

The responsible reporting office records every report and confirms receipt to the Whistleblower within

seven days

after submission.

In order to confirm receipt of their report, Whistleblowers must provide contact details or create a mailbox if they are using the electronic whistleblowing channel.

5.4 Plausibility check

The responsible reporting office analyzes the submitted information to determine if the reported facts are precise enough to indicate a Compliance Violation and warrant an investigation.

If needed, the responsible reporting office will contact the Whistleblower to clarify key aspects of the report and request additional information. The Whistleblower will be given a reasonable period to respond to any questions.

The responsible reporting office may close a registered report if

- The report is out of scope (e.g., because not related to Schaeffler incl. its supply chain),
- Is obviously unsubstantiated, i.e., there is obviously no indication for a Compliance Violation, or
- Further information cannot be obtained with legal means.

The responsible reporting office will inform the Whistleblower accordingly if the Whistleblower provided contact details.

If the facts do not establish a potential Compliance Violation but still warrant further follow-up, the responsible reporting office will either direct the Whistleblower to the appropriate internal department or, with the Whistleblower's consent and if contact information is available, forward the report directly to that department.

5.5 Conducting an Internal Investigation

If the pre-analysis indicates a potential Compliance Violation, the responsible reporting office will initiate an independent internal investigation.

To ensure fairness, especially when conflicts of interest arise, external experts may be engaged to carry out the investigation.

The objective of the investigation is to

- Get a clear understanding of the facts,
- Identify who committed an eventual violation and anyone who helped them,
- Determine when the violation took place,
- Evaluate the potential harm caused to Schaeffler and/or individuals involved.

Schaeffler has procedures in place to ensure that the persons tasked with the investigation can act independently and free from instructions that could compromise their objectivity. They are trained experts and accountable only to their superiors. This independence ensures a timely, impartial and professional clarification of the factual and legal situation, enabling objective processing of whistleblower reports in accordance with the need-to-know principle.

5.6 Cases of identified Group Relevance

Schaeffler reserves the right to have reports, indicating a potential Group Relevance, investigated centrally by the Compliance Forensics & Investigations department.

This applies for reports about particularly severe, actual or suspected acts such as:

- Active corruption and active bribery,
- Violations of antitrust law,
- Money laundering or terrorism financing activities,
- Systematic violations of books & records and reporting obligations,
- Systematic violations of data protection laws and regulation,
- Systematic violations of export control law,
- Severe violations of human rights or environmental law.

This further applies where the allegations are directed against the Management Board and/or high-ranking regional or divisional managers or when several legal entities are involved.

5.7 Closing an Internal Investigation

The Internal investigation will be closed when

- The Compliance Violation is sufficiently proven,
- The Internal Investigation disproves the Compliance Violation, or
- No further reasonable efforts can clarify the alleged facts.

5.8 Remedial actions

If a comprehensive investigation into the report is undertaken, Schaeffler will determine impact and risks and then decide eventually required remedial actions. Such actions may include but are not limited to disciplinary, legal, financial, or other compensatory actions, but also to mitigate identified risks and correct process deficiencies to prevent similar violations in the future.

If needed, Schaeffler will promptly implement remedial measures without delay.

5.9 Feedback to the Whistleblower

Follow-up report

In general, the responsible investigation office provides feedback to the Whistleblower within

three months

of acknowledging receipt, unless national laws mandate a shorter period. Feedback involves informing the Whistleblower, to the extent reasonable and permitted by data privacy laws and regulations. If the internal investigation is ongoing within this timeframe, the Whistleblower will receive a high-level status update.

Feedback after completion of the internal investigation

If the Whistleblower report triggered an internal investigation, the Whistleblower receives high-level feedback on the outcome at the end of the internal investigation. The aforementioned principles apply.

6 Protection of Whistleblowers and Affected Parties

Schaeffler is committed to protecting Whistleblowers and any parties collaborating in internal investigations from disadvantage or retaliation. To this end, Schaeffler has implemented robust processes and requirements.

These protective measures comprise:

6.1 Confidentiality

All individuals involved in receiving, handling, or acting on whistleblower reports, or providing support for those actions, must maintain strict confidentiality regarding the information they learn, especially the Whistleblower's identity. If Schaeffler needs to disclose information (e.g., to protect individual rights, implement recommendations, or comply with legal obligations), the number of individuals informed must be kept to a minimum and instructed on their confidentiality obligations (need-to-know principle).

If Schaeffler is legally required to disclose the Whistleblower's identity to third parties, such as law enforcement, Schaeffler may no longer be able to guarantee confidentiality. In such cases, the Whistleblower will be informed accordingly, unless legal or factual obstacles prevent this.

6.2 Prohibition of retaliation

Schaeffler strictly prohibits all forms of retaliation and reprisal, including threats or attempts to disadvantage Whistleblowers as a reaction to a good-faith whistleblowing report.

Failure to adhere to this prohibition constitutes a Compliance Violation, which may trigger an internal investigation and subsequent disciplinary measures.

6.3 Exclusion of liability

Schaeffler does not hold Whistleblowers legally accountable for reports made in good faith, whether internally or externally, and strictly prohibits any form of retaliation, discrimination, or reprisal against them or related third parties.

This protection does not apply if the Whistleblower committed a criminal act to obtain the information.

6.4 Protection and rights of the affected parties

In any internal investigation, the responsible investigation office has to respect the rights of the affected parties or any other party involved in or contributing to the investigation.

The following principles apply:

- Protection of personal rights and sensitive personal data.
- Fair and respectful treatment of all parties affected by an internal investigation.
- Presumption of innocence and right to be heard.

Objectivity, timeliness, proportionality, and impartiality of all investigative measures and conclusions.

7 External Reporting Offices

Whistleblowers can report issues through Schaeffler's reporting channels or to external bodies, such as anti-corruption agencies or the police. In countries with designated external reporting offices, refer to the country-specific annex of this Whistleblowing Guidance.

However, Schaeffler encourages using its internal reporting channels first, as they offer a deep understanding of workplace and business concerns and strong protection against retaliation.

Questions prior to submitting a report can be answered by Compliance Forensics & Investigations department at investigations@schaeffler.com or by the respective Local Compliance Representative.