

COMPLIANCE

compliance

whistleblowing system

mehr wien zum leben.
wienholding

Ein Unternehmen der Stadt#Wien

Employee Information

1. Introduction

With around 75 subsidiaries and approximately 3,500 employees in the fields of culture, real estate, logistics and media, Wien Holding GmbH has a significant impact on Vienna as a business location. In all our relationships with employees, customers, business partners and authorities, we strive for the highest standards through responsible action and integrity, because the key to the success of Wien Holding GmbH and its subsidiaries lies with the employees. Despite all efforts, misconduct can still occur.

The EU Directive on the protection of persons who report breaches of Union law (“EU Whistleblowing Directive”), came into force in December 2021 and has been implemented with the Whistleblower Protection Act (“HSchG”). In accordance with the EU directive, the law provides for the establishment of a reporting office for the confidential reporting of violations of EU law.

We want to ensure that you are free to raise your concerns or share your perceptions. You can continue to report your concerns and complaints at any time, either to the compliance office of the group company concerned or to the compliance office of Wien Holding GmbH. However, you also have the option of submitting a report externally and anonymously via the whistleblowing system.

In order to implement the EU directive, we have decided to cooperate with the independent ombudsman’s office O.P.P-Compliance GmbH (O.P.P.), based in Wels.

You can choose whether to report your concerns or perceptions internally to the compliance department or instead contact O.P.P. The process of the whistleblowing system is explained in more detail in the following employee information.

If you have any questions, please contact compliance@wienholding.at.

2. Implementation of the whistleblowing system

The independent ombudsman O.P.P. acts as a neutral and independent ombudsman and clearing house for all incoming reports. In this way, we ensure that whistleblowers remain anonymous to us, the company.

The ombudsman is available for reports on matters relating to violations in the following areas (simplified representation):

- public procurement,
- Financial services, financial products and financial markets as well as prevention of money laundering and terrorist financing,
- product safety and compliance,
- road safety,
- Environmental Protection,
- Radiation protection and nuclear safety,
- Food and feed safety, animal health and welfare,
- public health,
- consumer protection,

- protection of privacy and personal data and security of network and information systems,
- Prevention and punishment of criminal offenses (bribery, abuse of office, etc),
- Violations against the financial interests of the Union,
- smuggling,
- Tax fraud and cross-border VAT fraud,
- Subsidy Abuse.

You can report your concerns via telephone, email or the website www.meinhinweis.at/wienholdingkonzern. You can select which company is affected on the website.

Your concern will be received and processed by persons subject to a statutory duty of confidentiality, and will be forwarded anonymously to the person responsible (decentralized compliance officer or chief compliance officer), within the company concerned, for further processing.

The task of the ombudsman is to receive tips and reports, to guarantee the protection of the identity of whistleblowers as well as the persons affected by a tip or report, and to immediately forward these anonymously to the responsible persons of the companies concerned

3. When and how can the ombudsman be reached?

The ombudsman is available by phone on weekdays between 08:00 am and 8:00 pm and can be contacted at all times via the website www.meinhinweis.at/wienholdingkonzern or by email at hinweis@meinhinweis.at. Calls will only be recorded with your express consent and the content of all conversations or correspondence will be treated **confidentially**.

The ombudsman's office can be reached by telephone on 0660 104 21 55.

If you would like to report an incident anonymously, without displaying your mobile phone number, dial #31# 0660 104 21 55.

When contacting the ombudsman via the website www.meinhinweis.at/wienholdingkonzern click the **"report incident"** button to complete an online form. The form offers a step by step guide through the reporting process and asks for essential information related to your concern.

You may also report incidents by sending an email to hinweis@meinhinweis.at.

4. What happens when I call the ombudsman's office?

If you call the ombudsman's office, an independent, trained ombudsperson will ask you a few questions in order to be able to understand the background to your concern. This ombudsperson specializes in gathering the right information related to the concern you are reporting, as well as protecting you. They will never take sides and only act as an objective, professional third party.

If your comments do not relate to any of the subject areas covered by the EU directive (or its implementation into national law), the ombudsperson will point this out to you and let you know who to contact with your concerns.

5. What happens to my report?

Regardless of whether you report an incident by phone, via the whistleblower system or by email, all information regarding your identity will be kept secret by the ombudsman's office. All employees of the ombudsman's office are subject to a statutory duty of confidentiality. After your report is received, the ombudsman prepares an anonymous report which is then forwarded to the responsible person (Chief Compliance Officer or decentralized Compliance Officer) of the affected company for further processing.

6. Will I receive a response?

If you gave contact details when reporting an incident, you will receive a notification once your report has been reviewed. In case the investigation or review requires more time, you will receive an interim report on the processing status. If additional information is required in order to process your request, the ombudsman will contact you.

If you submit an anonymous report, you will receive a password, which you must give when contacting the ombudsman again, in order to receive information about the current status of your report.

If your tip does not fall under the scope of the Whistleblower Protection Act, you will be informed and, if necessary, referred to another suitable place to report to.

7. How do I ensure that my report remains anonymous and no conclusions can be drawn about my identity?

The whistleblowing system provides legal, technical and organizational protection if you wish to remain anonymous.

To further increase your security, consider the following points:

- If you wish to remain anonymous, do not provide any personal data, such as your name or your relationship to those involved. Also, refrain from providing details that could allow conclusions to be drawn about your identity.
- When reporting an incident by mobile phone, dial #31# 0660 104 21 55 to suppress your phone number.
- Make sure your internet connection is secure, indicated by the lock icon next to the address bar.
- If possible, go directly to the meinhinweis.at/wienholdingkonzern server, either by placing a bookmark on your introductory page, or by using the link: <https://meinhinweis.at/wienholdingkonzern/hinweis-geben/>
- If possible, do not use technical devices such as PCs, laptops, smartphones or telephones provided by your company. An intranet connection in particular, i.e. a network connection from the company network or Wi-Fi, could endanger your anonymity.
- Use a private email address when submitting a report via email.

8. Can I contact an external reporting office?

First of all, you should check whether you can submit your information via the ombudsman's office. A report should only be submitted to an external reporting office if it is not possible or reasonable to deal with the report in the internal whistleblower system or if such a report has proved unsuccessful or futile.

The reporting office of the Federal Bureau of Anti-Corruption (BAK) is (in future) available to you as an external office. At the time of the preparation of this document, this external reporting office had not yet been established. <https://www.bak.gv.at/601/>.

9. Hard facts

- Your concerns and any information you provide will always be treated anonymously and confidentially.
- You can maintain your anonymity when reporting to the ombudsman and do not have to provide any contact details or personal information.
- If you submit your report anonymously, you will receive a password which you must give when contacting the ombudsman again.
- Your report will be forwarded anonymously to the person responsible at the company concerned, for verification or further processing.

How to reach the ombudsman's office:

- By **telephone**, dial 0660 401 21 55 (if you wish to suppress your mobile phone number: #31# 0660 104 21 55) or
- with the **online incident form** www.meinhinweis.at/wienholdingkonzern or
- via **email** to hinweis@meinhinweis.at