



Dealing with the
Compliance Guidelines
of the Neschen Coating GmbH

DEALING WITH COMPLIANCE GUIDELINES

1. Purpose and scope

Compliance means adherence to rules, i.e., adherence to laws, guidelines, and voluntary codes of conduct in companies. As a consequence of the German Corporate Governance Code (DCGK), „Compliance“ is understood to mean the totality of all precautions required to ensure the legally compliant behavior of all employees with regard to all legal regulations and ethical principles affecting the company and its activities.

Violations of compliance with laws and regulations and internal policies and instructions can have severe consequences for Neschen or the individual and the Blue Cap Group. Therefore, reproachable deliberate misconduct will not be tolerated. The Blue Cap Group will sanction such misconduct and violations within the framework of the legal provisions without exception and regard to the rank and position of the person acting or affected.

The following topics are addressed in the Compliance Management System documents

(Item 4):

1. definition of corruption
2. goal and purpose of the anti-corruption policy
3. release, entry into force and updating of the anti-corruption policy
4. scope of the anti-corruption policy
5. dealings with public officials
6. gifts and invitations
7. dealing with representatives and consultants
8. donations and sponsoring
9. anti-corruption clause in contracts with business partners
- Zus. the Code of Conduct

2. Procedures and implementation

All managers are responsible for making the compliance management system (guidelines and Code of Conduct) publicly available to employees and obtaining at least once a year to obtain proof of knowledge (item 6).

Reported violations resulting from the guidelines must be reported at the end of each quarter to Ms. Gertz (Compliance Manager) at the end of each quarter. A report is also mandatory in the case of no violations mandatory (reporting obligation).

2.1 Reporting misconduct

Every employee has the possibility to report a violation of the guidelines anonymously as well as identifiable.

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Various communication channels are available for this purpose:

- Public mailbox (installation in the corridor of the personnel department)
- Reporting to the supervisor
- Reporting via the hotline 089/28890907 or e-mail compliance@bluecap.de.

For the written report, each employee can use the Form [FB_QM_017_01_Internal_Violation_Report_Compliance.docx](#) is available to each employee.

2.2 Collection of reported data

The reported violations are collected in the Compliance Management System and evaluated by the Compliance Management Team. Reported violations or information that does not relate to the guidelines are treated separately.

2.3 Classification of reports

Violations are classified according to severity and urgency of improvement and presented as measures to the responsible departments with a target date.

After successful feedback from the departments, all violations are documented in the quarterly report of the Compliance Management System quarterly report.

3. handling of results / responsibility

Remedial actions are documented with the result in the action plan by the responsible manager and filed in the Compliance Management System.

4. Applicable documents

[RL_BlueCapGruppe_Anti-Korruptions-Richtlinie_V1.pdf](#)
[RL_BlueCapGruppe_CodeOfConduct-Verhaltenskodex_V1.pdf](#)
[RL_Ergänzung_CodeOfConduct_NeschenGroup_V1.pdf](#)

5. Documentation

Documentation is managed in accordance with the Procedural Instructions for VA Documents.

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6. Training and monitoring

Every employee must be trained by the responsible manager at least once a year on the present procedure instruction and the applicable documents at least once a year.

In the case of the following criteria, employees must be trained immediately:

- Entry into the company
- Change in the revision status of the VA
- Determination of lack of training

For the evidence please use available evidence document:

FB_VIP3_009_02 Nachweis Unterweisungsnachweis.docx

7. Dealing with customers and suppliers

During national and international visits to suppliers or customers, increased attention must be paid to compliance with the compliance guidelines (e.g. child labor, forced labor, etc.).