



Execution	Participation	Information
Standort VG: Alle Geschäftsleiter, Menschenrechtsbeauftragter	Standort VG: Alle Werkleiter	
Standort VG: Alle Geschäftsleiter, Menschenrechtsbeauftragter	Standort VG: Alle Abteilungsleiter	
Standort VG: Menschenrechtsbeauftragter	Standort VG: Managementbeauftragte	
Standort VG: Menschenrechtsbeauftragter	Standort VG: Alle Geschäftsleiter	
Standort VG: Alle Geschäftsleiter, Menschenrechtsbeauftragter	Standort VG: Alle Werkleiter	
Standort VG: Menschenrechtsbeauftragter	Standort VG: Alle Geschäftsleiter	
Standort VG: Menschenrechtsbeauftragter	Standort VG: Alle Geschäftsleiter	
Standort VG: Alle Geschäftsleiter, Menschenrechtsbeauftragter	Standort VG: Alle Werkleiter	
Standort VG: Alle Werkleiter	Standort VG: Managementbeauftragte, Menschenrechtsbeauftragter	
Standort VG: Alle Geschäftsleiter, Menschenrechtsbeauftragter	Standort VG: Alle Werkleiter, Managementbeauftragte	

Purpose

Compliance with binding obligations and customer-specific requirements in the area of sustainability, Supply Chain Duty of Care Act and Whistleblower Protection Act.

Scope of application

Standort VG: Alle Abteilungsleiter, Alle Geschäftsleiter, Alle Werkleiter, Key-User, Managementbeauftragte, Menschenrechtsbeauftragter

Input

Customer-specific requirements, SAQ 5.0, national and international laws, regulations and conventions

Output

Code of Conduct / Code of Conduct for Business Partners, centralised action plan for evaluating information received for the management review and LkSG Annual Report/Sustainability Report.

Key figures

- Review report
- Sustainability report

Applicable documents

- Richtlinie "VG-Verhaltenskodex - Code of Conduct Vollmann Group 2023-08"
- Richtlinie "VG-Verhaltenskodex - Code of Conduct für Geschäftspartner 2023-08"
- Vorgabedokument "VG-Managementreview-F1"
- Vorgabedokument "VD-Informationssicherheitsbeauftragte / DSGVO / VG-ISMS-Managementreview-U4"

Explanations

[1] Aktivität: Report violations of legal obligations or contents of the Code of Conduct

In order to ensure compliance with all obligations, for example those imposed by the legislator or from our Code of Conduct, the Vollmann Group has established a whistleblower system for interested parties to report violations. This can be found on the homepage at <https://www.vollmann-group.com/hinweisgebersystem>. Reports and violations can be submitted via the following reporting channels:

Direct superiors / management

Human resources

Works Council

Human Rights Officer

All internal reports must also be submitted to the following reporting channels:

Email via compliance@vollmann-group.com

Post via Rosendahler Str. 98, 58285 Gevelsberg

Anonymous reporting is possible. Confidential treatment of identity is guaranteed.

The Vollmann Group generally refrains from retaliation against whistleblowers.

[2] Aktivität: Acknowledgement of receipt to the whistleblower

A confirmation of receipt will be sent to the whistleblower. This is done using the respective submission method.

[3] Aktivität: Transfer to an action plan

Indications of breaches of the Code of Conduct are translated into an action plan.

[4] Aktivität: Evaluation of available evidence

The information is then evaluated by the management representatives, the human rights officer and the management. If necessary, external experts are involved in the evaluation process.

[5] Entscheidung: Reference justified?

Is the notification received justified after evaluation?

If the notification is not authorised, it is archived in the central action plan, stating the reasons for non-authorisation

[6] Aktivität: Define and implement measures

If the report is justified, measures are defined in the central action plan. The measures are implemented as quickly as possible.

[7] Aktivität: Feedback to the whistleblower

The whistleblower receives information on the status of the implemented measures.

If the report is not justified, the whistleblower will nevertheless receive feedback on their submission. This feedback will be provided no later than three months after the confirmation of receipt.

[8] Aktivität: Annual evaluation of all notices against offences

The information and reports received each year are analysed as part of the management review and the sustainability report.

[9] Aktivität: Transfer results to the management review / sustainability report

The evaluation of the violations is transferred to Vorgabedokument "VG-Managementreview-F1" and included in the sustainability report.

Key to organizational units

Alle Abteilungsleiter = Alle Abteilungsleiter

Regulations

Bezug IATF 16949:2016

- 4.1 VERSTEHEN DER ORGANISATION UND IHRES KONTEXTES
- 4.2 VERSTEHEN DER ERFORDERNISSE UND ERWARTUNGEN INTERESSIERTER PARTEIEN
- 5.1 FÜHRUNG UND VERPFLICHTUNG

Goals

Implementation of sustainability requirements in the supply chain, compliance with the obligations of the Code of Conduct, early detection of misconduct.