

## Whistleblowing Policy (Summary)

Jubii Europe strongly encourages its employees to report suspected abuses or infringements of the applicable laws, such as financial and operational irregularities, in any shape or form to management and/or Supervisory Board and vows to treat such reports with the highest level confidentiality in the handling thereof.

There are three reporting steps to be considered by the reporting employee.

The reporting employee shall report a suspected abuse by e-mail first internally to the confidential adviser, which is Gaby Ostermann, Human Resources Director, who can be reached at [gaby.ostermann@Jubii.com](mailto:gaby.ostermann@Jubii.com) or any successor in function.

If the reporting employee does not agree with the findings by the confidential adviser, he shall report a suspected abuse internally by e-mail to the CEO of Jubii Europe N.V., which is Dr. Fred Wilsdorf, who can be reached at [fred.wilsdorf@Jubii.com](mailto:fred.wilsdorf@Jubii.com), or any successor in function.

If the reporting employee has reason to fear retaliation due to an internal reporting to the confidential adviser, he can report to the CEO directly, without first reporting to the confidential adviser.

If the reporting employee does not agree with the findings by the CEO, he shall report a suspected abuse internally by e-mail to the chairman of the supervisory board of Jubii Europe N.V., which is Dr. Martin Dannhoff, who can be reached at [martin.dannhoff@bertelsmann.de](mailto:martin.dannhoff@bertelsmann.de) or any successor in function. If the reporting employee has reason to fear retaliation due to an internal reporting to the CEO, he can report to the chairman of the supervisory board.

For detailed information please refer to the completed version of Whistleblowing Policy.