Whistleblowing and Internal Complaints
Rules of Procedure

This document is a translation of the German “Verfahrensordnung” which can be accessed here: https://www.continental.com/de/unternehmen/corporate-governance/integrity-hotline/

In case of discrepancy between this and the German document, the German document shall prevail.

Objective of this Document

This document outlines procedures regarding Continental AG’s whistleblowing and internal complaints system. It therefore takes into account § 8 sec. 2 of the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG).

These Rules of Procedure are publicly available through Continental AG’s website as well as through the Integrity Platform maintained by a third-party service provider, EQS Group AG.

Scope of the Whistleblowing and Internal Complaints System

Continental AG’s whistleblowing and internal complaints system is open to everyone with substantiated concerns regarding unethical and/or unlawful behavior by Continental, Continental personnel, and/or third parties including direct and indirect suppliers. Reports may be made for others and the concern reported doesn’t need to directly or indirectly affect the reporter.

This includes reports with regards to the following:

- Accounting manipulation
- Competition law/Antitrust law
- Unfair and unethical behavior, conflict of interest
- Corruption/Bribery (e.g. kickbacks)
- Data protection, IT Security/Cyber Crime
- Discrimination, (sexual) harassment, psychological distress
- Environmental rights
- Export and import control including sanctions
- Human rights (including child labor)
- Labor rights
- Market manipulation including insider trading
- Unauthorized private use of company property/resources
- Money laundering/Terrorist financing
- Physical distress
- Sabotage/Vandalism
- Work safety
- Tax evasion/fraud
- Technical Compliance (Product Compliance)
- Theft, embezzlement, personal enrichment
- Requests/suggestions regarding potentially severe matters
For reports concerning the following reporting categories, the individual report will be discussed between the whistleblower and a Continental contact person:

- Child labor (e.g. employing people below the permissible minimum age)
- Forced labor and (modern) slavery
- Disregard of labor law, freedom of association, health and safety, and adequate wage
- Air, water, and/or land pollution
- Unlawful eviction and disregard of land rights
- Assault initiated by security personnel
- Production and consumption of mercury including improper treatment of mercury waste
- Unlawful treatment of (hazardous) waste
- Other cases with relevance to the Act on Corporate Due Diligence Obligations in Supply Chains

Reporting Channels

Under the name “Integrity Hotline” Continental offers an online platform as well as a telephone hotline which can be used to report concerns anonymously.

You can access the reporting channels here:

**Online Platform (“Integrity Platform”):** [https://continental.integrityplatform.org/](https://continental.integrityplatform.org/)

**Telephone-Hotline (International):** +49 1802 73 76 78 (EUR 0,06 per call originating from German landline network; the amount charged can vary from cellphone or other networks) (additional, local phone numbers may be found [here](#))

Both reporting channels are available 24/7 in multiple languages.

Both reporting channels are managed by a third-party service provider.

It is possible to contact external reporting channels.

Process of the Whistleblowing and Internal Complaints System

1. **Report and Confirmation**

After submitting a concern via the Integrity Hotline, the whistleblower receives a confirmation of reception no later than seven days from the date submitted. The confirmation will be sent from an electronic mailbox. The whistleblower receives login credentials that enable the person to access the mailbox for further communication.

2. **Subsequent Communication**

An electronic mailbox is created for the whistleblower both when using the online platform as well as the telephone hotline. Using the received login credentials, the whistleblower can log in to the mailbox anytime to receive information on the current state of their report. Continental uses the mailbox to communicate with the whistleblower.

   **Important:** Whistleblowers should set aside the login credentials safely and log in to their electronic mailbox regularly, as it is the whistleblowing and internal complaints system’s only communication channel.

3. **Anonymity and Confidentiality**

Whistleblowers can choose to stay anonymous. If they do, further communication is performed using the electronic mailbox whilst maintaining the whistleblower’s anonymity.

If the whistleblower chooses to reveal his/her identity, their identity will be protected in accordance with the law. Individuals working on the case are obligated by law to observe confidentiality and act independently.
4. **Further Case Work**

Case coordination is performed by the qualified departments Group Compliance, Group Internal Audit, and Group Security. For cases reported by telephone, sound recordings will be transcribed and deleted after successful transcription. The transcript record (created verbatim) can be accessed, read, corrected, and approved in the Integrity Platform. After an initial review the department responsible for case coordination will forward the report/complaint to an investigating department, if applicable.

While processing the report, questions can arise. Continental recommends whistleblowers stay in contact with Continental via the Integrity Hotline so that questions can be answered.

Feedback on the current state of the whistleblower’s report will be provided no later than three months after initial reporting.

5. **Corrective Action**

If a deeper investigation into the case is launched, it is at Continental’s discretion to close it, define results, and take corrective action. If necessary, Continental will initiate corrective action without delay.

**Responsibility**

Continental AG’s Chief Compliance Officer is responsible for the Whistleblowing and Internal Complaints System.

Group functions “Group Compliance”, “Group Internal Audit” and “Group Security” are tasked with coordinating incoming reports and complaints. Investigations may also be forwarded to other functions depending on the facts of the case.

**Whistleblower Protection**

Reported concerns will, in accordance with applicable law, be treated confidentially.

Continental does not tolerate retaliatory measures against whistleblowers by Continental personnel or Continental suppliers.

Individuals who are grossly negligent when reporting or deliberately report false allegations are not covered by whistleblower protection.