

NOMOS Whistleblower Policy & Grievance Mechanism

June 2026

At NOMOS Glashütte, we are committed to the highest standards of openness, integrity, and accountability. As a pioneer in sustainable and inclusive development, we strive to live by our Codes of Conduct and ensure that all our activities comply with the principles of the UN Global Compact, the International Labour Organization (ILO), the Universal Declaration of Human Rights, and the United Nations Sustainable Development Goals (SDGs).

An essential component of responsible and transparent conduct is a mechanism that enables all employees and external stakeholders to raise concerns and provide feedback in a responsible and effective manner.

Purpose

Openness protects. It protects people, our collaboration, our supply chain, and the trust that others place in NOMOS Glashütte. To ensure compliance with our internal obligations and throughout our entire supply chain, we encourage anyone who becomes aware of information indicating misconduct or violations of the principles of our Codes of Conduct or the Supplier Code to report it. This applies to incidents both within our company and within our supply chain.

This mechanism focuses specifically on actual or potential negative impacts related to human rights or environmental obligations within our direct and indirect supply chains. It reflects our commitment to environmental, social, and governance (ESG) principles and our commitment to a sustainable future, and forms the foundation for honest, cooperative, and ethical collaboration.

We support anyone who, in good faith and with verifiable evidence or on the basis of a reasonable belief, reports misconduct that contradicts our values. We do not want silence that hides problems – we want openness that solves them. This mechanism is not intended to challenge business decisions or reopen issues that have already been resolved.

Scope of Application

This mechanism is open to everyone: those directly affected, as well as anyone who is aware of violations of our Codes of Conduct – whether within our organization or among external partners.

Sensitive Information

We treat all information provided by whistleblowers with care, impartiality, respect, and confidentiality. It will be used exclusively within the scope of the internal investigation triggered by the report.

We are committed to ensuring that all individuals involved in the investigation or who become aware of the matter maintain confidentiality to the extent permitted by law.

Protection Against Retaliation

We protect whistleblowers from any form of discrimination. We do not tolerate any retaliatory measures, discrimination, or sanctions against employees who report irregularities to the best of their knowledge and belief.

An essential component of this protection is safeguarding the whistleblower's identity and permitting anonymous reports. Ideally, we would like to contact the person filing the complaint to better understand the facts and clarify any questions. At the same time, we recognize that the sensitivity of certain matters may require complete anonymity. Complaints may therefore, of course, also be submitted anonymously.

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Non-Obstruction of Justice

In cases involving allegations with potential legal consequences, we cooperate fully with the relevant authorities and do not interfere in any way with the course of legal proceedings.

Complaint Channels

To ensure accessibility, we offer several secure reporting channels:

- **Email:** compliance@glashuette.com
- **Post:** NOMOS Glashütte/SA Roland Schwertner KG
Human Resources Department
Ferdinand-Adolph-Lange-Platz 2
01768 Glashütte
Germany
- **Additionally, for NOMOS employees:**
Suggestion and complaint boxes are available at the following locations:
 - NOMOS Glashütte: Delivery area on the ground floor of the train station.
 - Berlinerblau: In the lobby.

Complaint Process

A report does not have to be perfect. What is important is that it clearly describes the issue at hand. To help us review reports quickly and thoroughly, the following (voluntary) information is particularly helpful:

- 1) **Contact Information:** Name and contact details of the person filing the complaint, as well as their employer (if applicable).
- 2) **Confidentiality:** Please indicate whether you wish to remain anonymous.
- 3) **Name of the Organization:** Name of the affected NOMOS company or name of the affected supplier or employer.
- 4) **Affected Unit:** Name of the business unit, department, or business partner.
- 5) **Potential Risk or Violation:** Description of the suspected misconduct or violation of the Codes of Conduct, Supplier Code, or other human rights or environmental risks.
- 6) **Facts:** Brief description of the situation, including any available supporting information or evidence and when the incident occurred.
- 7) **Scale and Scope:** How many people are affected? What negative impacts are there on people, the environment, or both?
- 8) **Desired Solution:** What measures do you believe should be taken to resolve the situation?
- 9) **Parallel Proceedings:** Has a complaint already been filed with the organization in question? Are any mediation, arbitration, or court proceedings pending?
- 10) **Background:** Has this matter been reported to NOMOS Glashütte or another organization in the past?
- 11) **Additional Information:** Names of individuals or organizations with further relevant information, as well as any relevant contextual factors that are necessary to understand or investigate the matter.

Complaint Procedure

Every report is taken seriously. The process follows clear steps:

1) Receipt and Classification

The Human Resources department at NOMOS Glashütte receives every complaint, initially assesses it, and forwards the case to the appropriate department.

2) Confirmation of Receipt

Within ten business days, you will receive a confirmation with information regarding the estimated processing time and your point of contact.

3) Review of the Complaint

We review whether the facts presented violate national or international laws and regulations or the principles of our Codes of Conduct. If essential information is missing, we will obtain it to the extent possible – if necessary, by contacting you for clarification.

4) Clarification of the Facts

Complaints that fall within the scope of this mechanism are reviewed by the relevant departments and senior management. To assess the allegations, we conduct an impartial internal investigation. Through dialogue with you, we clarify your expectations regarding preventive, mitigating, or remedial measures. If necessary, we may engage an independent third party to conduct an external investigation or to facilitate a mediation process.

5) Conflict Resolution and Redress

If we identify a risk of non-compliance or a violation of our Codes of Conduct, Supplier Code, human rights or environmental obligations, we will take appropriate preventive, mitigating, and remedial measures. We strive for an appropriate, fair, and effective resolution.

6) Acceptance, Review, and Closure

We present the solution reached and the measures taken to the complainant and invite their feedback on the process. The body responsible for the complaint monitors the implementation of the agreed-upon measures over a specified period and then closes the case.

7) Effectiveness Review

We review our complaint mechanism annually to improve our social and environmental performance and reduce adverse impacts. Your feedback is incorporated into this continuous improvement process.

Anyone who provides feedback helps us identify risks and prevent harm. This is an important contribution to responsible conduct – and we thank you for it.