



OPTIMAL®



Code of Procedure relating to the OPTIMAL Automotive GmbH Whistleblower System

Preamble

Our entire entrepreneurial action is characterized by the following principle:

“We adhere to and comply with applicable law and internal policies at all times.”

As OPTIMAL Automotive GmbH we commit ourselves together with our sister companies, the Stahlgruber GmbH, PV Automotive GmbH, Neimcke GmbH & Co. KG and Stahlgruber Gesellschaft m.b.H. (Austria) (collectively referred to as STAHLGRUBER), to an open corporate culture. We encourage our employees, suppliers and customers to report any violations of the law via the reporting office set up for this purpose to report indications of violations of applicable law and internal guidelines („violations“). In so doing we help identify violations and take follow-up action in compliance with the law in order to effectively eliminate any wrongdoings.

Also, you are expressly permitted to use this reporting unit to speak up and report any human rights and environmental risks in the supply chain (cf. itemization Section 2 (2) and (3) German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG).

Individuals who report in good faith alleged wrongdoings or violations are specially protected under the German Whistleblower Protection Act (HinSchG).

Reporting any alleged wrongdoings or violations of policies and laws enables us to immediately resolve the violation and take appropriate measures in order to avoid future violations where possible.

This code of procedure describes the way how we will handle incoming reports and how we will protect individuals raising a concern.

1) Raising a Concern (internal reporting unit)

Our Speak Up! whistleblower portal allows all internal and external whistleblowers to immediately submit reports on potential compliance violations.

Our whistleblower portal can be accessed any time via the link www.lkqcorp.ethicspoint.com. You can also find the link on our website www.optimal-germany.com under the tab “Company” → [Compliance](#).

You can place your report either anonymously, or by giving your name. In addition, you can reach out to us via our 24/7 whistleblower hotline under the phone number **0800 182 105 2**.

You may also elect to directly report any violations of the German Supply Chain Due Diligence Act (LkSG) to the Human Rights Officer of STAHLGRUBER under compliance@stahlgruber.de. You can disclose your information in 19 different languages.



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2) Handling of Incoming Reports

Upon receipt of a report the respective whistleblower will receive an **acknowledgement of receipt**. We will assess every concern raised for soundness and trustworthiness, and STAHLGRUBER will comprehensively document this information in order to determine appropriate follow-up action. In so doing, confidentiality (see no. 3 below) will be respected at all times. In some cases, STAHLGRUBER reserves the right to call in internal or external investigators. **We hereby assure that the persons in charge of receiving your report or concerns are qualified and independently working experts, free from any conflicts of interest.**

No later than three months after receiving the report we will follow up with the person who raised the concern in good faith and provide her/him with feedback on planned or already taken corrective action. However, we will refrain from doing this, if there is a risk that the provision of feedback will interfere with internal inquiries and/or investigations and infringe the rights of individuals who are the subject matter of or identified by name in such report.

3) Confidentiality

The identity of the person who raised the concern and of the individuals who are the subject matter of a report as well as the identity of any other party named in the report will be protected and kept confidential. Only the persons in charge of receiving reports or taking follow-up action, or individuals in the role of backing them up in their effort to fulfil their tasks will have knowledge of the identity of the aforesaid parties.

The principle of confidentiality shall not apply:

- to any person who reports false information on possible violations, either deliberately or doing so with gross negligence;
- in criminal proceedings, if requested by the law enforcement authorities;
- due to an order in administrative proceedings instigated after the report was submitted, including administrative fine proceedings;
- due to a court decision;
- with regard to any other exceptions as set forth in Section 9 (2) and (3) German Whistleblower Protection Act (HinSchG).

4) Investigation Principle

The presumption of innocence shall apply until the concerned person accused of a compliance violation is proven accountable.

If a person reports in good faith an alleged compliance violation, such person's identity (if the report was not made anonymously) and any information made available shall be shared on a strict need-to-know basis and only to the extent necessary to carry out an appropriate investigation or solve the issue.

OPTIMAL aims to reach out to the person who raised a concern and provide them with feedback on the progress and the outcome of the investigation.

The persons concerned and the senior management will be informed about the measures taken and the resultant effects only, if, in response to the situation, the persons concerned have a legitimate interest in the information.



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5) No Retaliation

OPTIMAL has zero tolerance for retaliation or discrimination against those who in good faith report alleged wrongdoing or participate in an investigation of wrongdoing. Also, persons raising a concern cannot be held legally responsible for obtaining or accessing the information reported or disclosed by them.

Reprisals against persons who have raised a concern, including the threat or attempt of taking reprisals are forbidden by law.

In a case of non-compliance of the ban on reprisals the responsible person shall be liable to pay damages to the person raising a concern pursuant to Section 37 (1) German Whistleblower Protection Act (HinSchG).

6) False Reports

Anyone who reports wrong information on (alleged) wrongdoings deliberately or does so with gross negligence is not protected under the German Whistleblower Protection Act (HinSchG) und shall be held liable for damages pursuant to Section 38 German Whistleblower Protection Act (HinSchG). In addition, the deliberate reporting of false accusations may result in disciplinary consequences including termination of employment.

7) Additional Validity of the German Whistleblower Protection Act (HinSchG)

In addition to the foregoing, the provisions under the German Whistleblower Protection Act (HinSchG) as amended from time to time shall apply.



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