

WHISTLEBLOWING POLICY

Our Code of Conduct¹ requires the employees, freelancers, contractors, directors or suppliers of services and/or goods ("Staff") of Meissner² ("Company") to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Company, we must practice honesty and integrity in fulfilling our responsibilities and comply with applicable policies, laws and regulations.

We have adopted this Whistleblowing Policy ("Policy") to promote a climate of accountability and to strongly encourage concerns of undesirable conduct to be reported before they can disrupt the business or operations of the Company.

Where you discover information which you believe shows serious malpractice or wrongdoing within the organization of our Company then this information should be disclosed internally without fear of reprisal, and there are arrangements in place to enable this to be done independently of line management.

We will take all reports made under this Policy seriously and will not tolerate retaliation against any person who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. It should be emphasized that this Policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Scope and Compliance

This Policy is applicable to all current and former Staff members.

This Policy is designed for you to raise concerns internally and at a high level about Reportable Conduct ("Whistleblower Report"). Reportable Conduct is any conduct that you reasonably believe constitutes a contravention of our Code of Conduct which has come to you in a work-related context. It does not include interpersonal grievances.

In practice, a mere allegation with no supporting information is unlikely to reach that standard. But it should also be clear that it is not expected of you to provide conclusive evidence for your allegations.

Examples of Reportable Conduct include but are not limited to: criminal offences including illegal conduct such as theft, violence or threatened violence, and criminal damage against property; fraud, money laundering or misappropriation of funds; offering or accepting a bribe; financial malpractice; improper use of public funds; failure to comply with, or breach of, legal or regulatory requirements; endangering the health and safety of our Staff and/or customers; miscarriage of justice; endangering the environment or concealing or destroying evidence of wrongdoing.

¹ Available for download at <https://www.meissner.com/meissner-code-of-conduct.pdf>

² Meissner Filtration Products, Inc. and all of its subsidiaries

How to make a Whistleblower Report

In order to make your disclosures, contact your line manager or our CEO, Christopher Meissner, directly.

You can choose to make your Whistleblower Report anonymously and if so, you will still be protected under this Policy and applicable laws. To this effect you may contact our ombudsman, Dr. Daniel Heintel, under heintel@jaegerheintel.com or +49 89 380 330 960, who is contractually obliged not to disclose your identity save for the exceptions stated below under Confidentiality.

Nevertheless, we encourage you to put your name to any disclosures you make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.

What to include in the Whistleblower Report

Your Whistleblower Report should include as much detailed information as possible so that it can be investigated. Some useful details include:

- date, time and location;
- names of person(s) involved, roles and their business group;
- your relationship with the person(s) involved;
- the general nature of your concern;
- how you became aware of the issue;
possible witnesses; and
- other information to support the Whistleblower Report.

How a Whistleblower Report will be investigated

All Whistleblower Reports will be considered by the management and taken seriously and assessed carefully to determine whether an investigation will be required.

While the particular circumstances of each Whistleblower Report may require different investigation steps, all investigations will:

- follow a fair process;
- be conducted as quickly and efficiently as the circumstances permit;
- determine whether there is enough evidence to substantiate the matters reported; and
- be independent of the person(s) concerned with the allegations.

The outcome of the investigation will be detailed in a written report containing the findings of the investigations ("Investigation Report"). The management will decide what action to take based on the Investigation Report. If the complaint is shown to be justified, then actions will be taken in accordance with disciplinary or other appropriate Company procedures.

You will be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

Due to the varied nature of the complaints raised and investigations carried out, which may involve internal/external investigators and/or the police, it is not possible to lay down precise timescales for such investigations. We will ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

Safeguards

Protection

We will not tolerate penalization or retaliation in any form against any of you, acting in good faith, who reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation, directly or indirectly, or encourages others to do so, may be subject to disciplinary action, including termination of employment.

Confidentiality

We will treat all disclosures by you in a confidential and sensitive manner.

Where you make a disclosure, your identity (or any information which could identify you) will only be shared where:

- your prior consent was provided; or
- we are required by law or court/administrative order; or
- the disclosure is reasonably considered necessary for the receipt, transmission or follow up on the Whistleblowing Report.

Diligence

In making a disclosure you should exercise due care to ensure the accuracy of the information. If you make an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against you.

However, if you make malicious or vexatious allegations, and particularly if you persist with making them, disciplinary action may be taken against you.