

Whistleblowing:

To ensure our compliance and to fulfil our obligations under the German Whistleblower Protection Act (HinSchG) to set up an internal reporting office, we, DB Intermodal Services GmbH have assigned the tasks of the internal reporting office to DB Cargo Compliance.

Internal reporting channels

DB Cargo AG's internal whistleblower system offers various channels for reporting possible violations:

- Electronic whistleblower system of the DB Group: [BKMS](#)
- DB Cargo Compliance - Compliance Officer Dr Bettina Wunsch-Semmler
 - e-mail: compliance-dbcargo@deutschebahn.com
 - Phone: +49 69 265-34013
 - DB Cargo AG, Compliance Officer (L.CVM 2), Rheinstraße 2, 55116 Mainz, Germany

This is where you can report a specific suspicion of a serious violation of DB laws and regulations.

To be able to process offences as quickly and comprehensively as possible, it is important that your report contains as much specific information as possible. It is helpful if you consider the 5 W's: Who? What? When? Where? Why?

External reporting channel

As a whistleblower, you have the right to choose between submitting a report to an internal or external reporting channel. Internal reports are usually the shortest way to eliminate grievances.

With the German Federal Office of Justice, the Whistleblower Office of the German Federal Financial Supervisory Authority and the Whistleblower Office of the German Federal Cartel Office, there are a total of three external reporting channels on whose homepage you can find further information.

FAQ: Questions and answers on the whistleblower system

Who can provide information?

Whistleblowers can be any employee or person in a comparable position who has obtained information about violations in connection with their professional activities or prior to their professional activities. Business partners, customers and other third parties who become aware of violations during their professional activities with DB Intermodal Services GmbH can also report them to the Whistleblowing Unit.

What types of violations can be reported to the internal reporting office?

According to legal requirements, the internal reporting office is obliged to investigate all reports of violations of German criminal law, certain fine regulations (e.g., occupational health and safety), the German law on the tracing of profits from serious offences, the German Banking Act, European law, supervisory regulations, the Code of Conduct or employee guidelines and similar legal violations. A detailed list of all laws can be found under § 2 HinSchG (<https://www.rbh-logistics.com/interne-meldestelle-gem-hinschg>).

The Whistleblowing Centre is not responsible for complaints from customers about products and services of DB Intermodal Services GmbH and its subsidiaries; these do not constitute whistleblowing reports. Please contact our local team for this purpose.

How am I protected when submitting a report?

The reporting centre must maintain the confidentiality of both the reporting person and the person who is the subject of the report throughout the entire process. The identity of the whistleblower and the persons concerned will be treated confidentially in accordance with the HinSchG and the Federal Data Protection Act and will only be disclosed to the persons responsible for receiving reports or taking follow-up action. Whistleblowers are protected against reprisals and discrimination, e.g., disciplinary measures, dismissals based on the report, in particular in accordance with § 36 HinSchG. Even the threat or attempt of discrimination is prohibited. This protection does not apply if the whistleblower has intentionally or grossly negligently reported incorrect or false information via the whistleblowing system.

How long does it take to check the notification?

The duration of the review can last from a few days to several months. It depends on the scope and complexity of the matter.

What is the procedure for checking the notice?

Upon receipt of your report, it will first be checked for validity by the authorised persons of the internal reporting office, i.e., it will be checked whether the material scope of application according to § 2 HinSchG is opened and whether there are sufficient indications of a violation. If, after the initial assessment of the reported facts, the internal reporting office assumes that there are sufficient grounds for suspicion of a violation, appropriate follow-up measures can be initiated to further clarify the facts, e.g., internal interviews.

As a whistleblower, will I receive information about the status of my report?

The reporting person will receive feedback on the status of the processing of their report during the investigation period. You will receive confirmation of receipt of your report no later than seven days after the report is made. Within three months of receipt of the report, you will receive feedback on any follow-up measures planned or already taken and the reasons for these.

Can I also report an offence anonymously?

You have the option of submitting a report anonymously. Reports received anonymously will also be investigated by the internal reporting centre as far as possible. A non-anonymous report is preferable, as the possibility of making enquiries increases the clarification rate. However, if - for whatever reason - a non-anonymous report seems too unsafe, please report anonymously to the best of your knowledge and belief.

What happens to the data that I have passed on as part of my notification?

The data you provide will be stored confidentially and in compliance with data protection regulations throughout the entire process. Access to this data is restricted exclusively to the employees of the internal reporting office and may only be forwarded to the responsible office for further clarification of the facts in the exceptional cases regulated by law. In such cases, the reporting office must inform the whistleblower in advance of the disclosure. If the disclosure of the identity of the whistleblower is necessary for further follow-up measures, written consent must be obtained prior to disclosure. The documentation will be deleted three years after completion of the procedure. It may be necessary to retain the documentation for longer to fulfil the requirements of this Act or other legal provisions.

Data protection information

I have additional questions or concerns about submitting a report.

If you require further information before submitting a report, please contact our Compliance Officer. This will be done under the condition of confidentiality.

Further information on the DB Cargo AG Reporting Centre can be found on the DB Cargo AG Internet and Intranet sites (<https://www.dbcargo.com/rail-de-de>).