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# Rules of Procedure for Complaints and Whistleblowing of MTU Aero Engines AG

01/2024

## 1. Purpose

We do not tolerate any irregular or illegal behavior. We respond immediately to reports and investigate them thoroughly. We consistently punish any offences found. If it turns out that there was merely a misunderstanding, this information can still be helpful in improving our work processes and relationships.

Integrity begins when you do the right thing out of your own conviction - even when others do not. At MTU, we have set up reporting channels for unlawful behavior, through which not only employees but also external parties can report conspicuous circumstances or draw attention to grievances.

Of course, whistleblowers who act in good faith do not have to fear any sanctions or disadvantages from the company, even if the report later proves to be incorrect. We would like to thank you for your information and your interest in protecting our company and our stakeholders and in eliminating possible grievances.

## 2. Scope of Application

The complaints procedure can be used to report all indications of possible violations of laws and/or regulations, including human rights or environmental risks or violations in your own business area and along the entire value chain.

The complaints procedure is available to our employees and external persons and organizations alike.

### 3. Reporting channels

To make it as easy as possible to submit a report, we have set up various reporting channels, including the option to report anonymously:

#### a) iTrust

We have established an internet-based whistleblower system ('iTrust') as a central element for reporting possible legal violations or possible misconduct, which is available to all our own employees as well as the employees of our suppliers and business partners and other third parties at any time to provide confidential information on possible breaches of regulations - anonymously if desired. In this regard, we strongly encourage whistleblowers to use the option provided by iTrust to set up an electronic mailbox to communicate with the Compliance Officer.

iTrust is available in various languages.

Link: [Home - BKMS System](#)

#### b) Ombudsperson

If you suspect possible misconduct on the part of MTU, MTU employees or third parties who have a business relationship with us, you can contact the ombudsperson - anonymously if you wish. The ombudsperson is the head of the Compliance Office of MTU Aero Engines AG.

Contact: [ombudsmann@mtu.de](mailto:ombudsmann@mtu.de)

#### c) By regular mail

Information can be sent by post to  
MTU Aero Engines AG  
Compliance Office  
Dachauer Str. 665  
80995 Munich

#### d) Direct communication

Of course, direct communication channels are also available for reporting breaches of regulations to the Compliance Office, managers, contact persons from the HR department or employee representatives.

Contact the Compliance Office: [compliance@mtu.de](mailto:compliance@mtu.de)

## **4. Course of the Proceedings**

### **a) Responsibility**

The MTU Compliance Officer is generally responsible for processing reports of unlawful behavior received via iTrust or reported via other channels. Depending on the content of the alleged misconduct, other company units may be involved in an investigation or the investigation may be transferred to them.

### **b) Receipt of the Report and Confirmation**

A detailed report, including details of the persons involved, the time and extent of the offence, any previous reports to other bodies and other supporting facts will help us to investigate and clarify the matter quickly. All this information is, of course, voluntary.

Upon receipt of a report, the whistleblower will receive confirmation of receipt. If necessary, additional, necessary and relevant information and documents will be requested from the whistleblower, provided that communication (e.g. setting up a mailbox at iTrust even in the case of an anonymous report) is technically possible.

The identity of the whistleblower and the content of the report will be treated confidentially. Incoming anonymous reports will not be traced.

Data will only be passed on to other bodies within or outside MTU if and insofar as this is necessary to investigate and clarify the report or to derive follow-up measures.

### **c) Initial Assessment of the Report**

Upon receipt of the report, an initial assessment of the possible breach of the rules is carried out.

### **d) Investigation and Clarification**

Depending on the nature and severity of the allegation, appropriate measures are initiated or coordinated by the Compliance Office. This initially includes clarifying the facts and subsequently coordinating the necessary and appropriate remedial measures. If necessary, other departments (such as the Data Protection Officer, Internal Audit, Corporate Security) are involved confidentially or the report is passed on to appropriate bodies (e.g. investigating authorities, contact points at suppliers, customers or partners).

The Compliance Officer has comprehensive rights to information, inspection and disclosure and coordinates the investigation confidentially and neutrally. The presumption of innocence applies until an offence is proven. Incriminating and exonerating facts are equally included in the investigation.

If questions arise during the investigation, the person providing the information will be asked for further clarification or plausibility checks if communication is possible.

#### **e) Duration of Proceedings**

We endeavor to process a report quickly and complete the investigation promptly. However, the duration of proceedings in individual cases depends on various factors, such as the extent of the allegation and the feedback from the whistleblower in the event of queries. Proper proceedings can therefore take several days or even several months.

#### **f) Result of the Investigation**

Once the investigation has been completed, the necessary, suitable and appropriate follow-up measures are defined in the event of substantiated reports.

Unlawful behavior by MTU employees may result in measures under employment law (e.g. warning, termination, claims for restitution, repayment and/or compensation), depending on the severity of the violation. Measures taken against suppliers or business partners are governed by the applicable law and the corresponding contractual agreements.

MTU reserves the right to file criminal charges if criminal offences are detected.

#### **g) Feedback to the Whistleblower**

The whistleblower will be informed of the conclusion of the investigation. Personal data will be deleted or anonymized once the relevant retention periods have expired.

#### **h) Protection against Discrimination**

A complaints procedure is only effective if the whistleblower is protected from disadvantages and reprisals resulting from the report. We therefore do not tolerate retaliation. Persons who have provided information in good faith will not be penalized. If the whistleblower or another person has the impression that the whistleblower or another person is suffering unjustified disadvantages as a result of the report or



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that retaliatory measures are being taken against these persons, a report can be submitted to us immediately via the reporting channels described in these rules of procedure.

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