

Speak Up Policy

1. Introduction

Canyon stands for tolerance and respect for each other, as well as for mutual support and equal opportunities. We embrace diversity and the right to speak up freely. We are committed to sustainable actions, social engagement, equality, and justice. Discriminating behaviour, racism and violence have no place at Canyon.

Employees (applicants, current or former), direct and indirect suppliers and business partners and their employees, customers, communities, and other interest groups can report any actual or suspected cases of violations or violations that may arise against our values and principles, and that are connected to our activities. This includes but it is not limited to:

- [Violations and abuses of human rights and environmental laws](#)
- [Violations against the Canyon Code of Ethics, Supply Chain Code of Conduct, Child and Forced Labour Policy or other ESG policies published by Canyon.](#)
- [Criminal or administrative offences](#)
- [Violations of product safety or consumer protection laws](#)
- [Breaches of competition, antitrust, or privacy and data protection laws](#)

To report concerns that may represent immediate threat to either life or property, the whistleblower should also reach out to the emergency services and/or local authorities. In case this is not possible, or the situation is not resolved, they should indicate this in the report.

Please provide as much information and detail as possible about the case you are reporting. This may include the name and contact of witnesses or other details to prove the violation (e.g. people involved, date, time, evidence, etc)

The Speak Up platform may not be used to make false accusations against others, or to report deliberately untrue information.

2. Reporting Channels

When raising concerns, the following reporting channels are available.

- Canyon has set up a web-based Speak Up platform: canyon.integrityline.com, which is open 24/7 and publicly available in several languages. This platform can be used to raise concerns confidentially, and anonymously when preferred. In any case, we encourage whistleblowers to include their name as this can help us to conduct the investigation more effectively. Any personal data provided will be treated in compliance with the applicable regulations and our privacy policy.
- Canyon has appointed an external, neutral, and independent lawyer (Ombudsperson) to advise on this process, to receive all reported incidents and to ensure that all reports are addressed by the relevant Canyon Whistleblowing Officers.

The contact details of Canyon's Ombudsperson are as follows:

Sarah Emmes
Attorney at Law / Rechtsanwältin
Mainzer Straße 108
56068 Koblenz, Germany
Phone: 0261 / 30 13 54 0
E-mail: sarah.emmes@kunzrechtsanwaelte.de

- For internal reports, Canyon's own employees can also approach their direct managers, who may be able to address their concern or redirect it to the appropriate person. In case this is inappropriate, or the employee does not feel comfortable approaching the corresponding manager, he or she can also approach any other company representative or manager.

3. Confidentiality and Anonymity

The whistleblower has the right to submit a report anonymously. These reports should be submitted using the Speak Up platform, where there is a specific function to allow the Whistleblowing Officers to contact them for any questions or feedback required.

In case the whistleblower discloses his or her identity, this will be treated confidentially, together with the content of the report, the names of the persons named in the report or other people affected. The Whistleblowing Officers always ensure the confidentiality of the whistleblower. This is ensured by the fact that all identity-related information is not processed on Canyon's IT infrastructure but exclusively on servers of the tool provider. Only the Whistleblowing Officers and the employees of the tool provider have access to the whistleblowing data on the servers of the tool provider (a data processing agreement pursuant to the General Data Protection Regulation has been signed with the tool provider). Confidentiality is also ensured with the electronic file management.

Through the independent Speak Up platform we can guarantee you full anonymity if you follow the steps below:

- If possible, do not report from a computer/laptop provided by your employer.
- Do not use a computer/laptop that is connected to the company's internal network.
- Access the reporting system directly by copying or writing the URL address in an internet browser rather than by clicking on a link.

In case of anonymous reports, the legal obligations from Canyon are limited.

4. Responsibility

We take all reports very seriously and will act accordingly. This includes immediate review of received reports, objective review of the reported incident, including document review, interviews, and other appropriate measures, initiating a remediation process where indicated.

Canyon's Ombudsperson is responsible for acknowledging reported misconduct and determining the responsible case manager, directing the report to the relevant Canyon Whistleblowing Officers, in-line with pre-defined categories and responsibilities. There are five Whistleblowing Officers at Canyon: the Global Legal Director, the Global ESG Director, the VP People, the Senior Director People, and the Manager Human Rights.

These Whistleblowing Officers operate independently, they are not subject to any instructions from management in this function, and they ensure the case management aligns seamlessly with compliance needs.

In case of a complaint involving the Whistleblowing Officers, Managing Directors, Executive Leadership Team, including the CEO, or a situation that is directly threatening the health and safety of an individual or a community, the complaint will be directed to the Advisory Board Chair only, who will be responsible for the case management.

5. Report Handling Procedure

1. Receipt confirmation and categorization
Canyon's Ombudsperson will acknowledge any reported misconduct within seven days of receipt. Canyon's Ombudsperson will also determine the responsible case manager and direct the report to the relevant Canyon Whistleblowing Officers.

2. Investigation
The responsible Whistleblowing Officer will conduct the investigation to establish the material facts, in line with the applicable laws and regulations. This process may include documentation review, interviews, and data analysis. The duration of this investigation process will depend on each individual case and the whistleblower will be updated regularly on the status.
3. Remedy and feedback
Based on the conclusions of the investigation, if it is found that misconduct has occurred, actions will be proposed, and appropriate remedial measures implemented. Once the case is closed, final feedback will be provided to the Whistleblower.
4. Continuous effectiveness measurement
To ensure the adequacy of the process, the effectiveness of this procedure will be reviewed at least once every year and on an ad hoc basis if required. We also encourage Whistleblowers to make improvement proposals by sending in a separate report through the Speak Up platform.

6. Protection and Non-Retaliation

In accordance with our company values and our legal requirements, any form of retaliation against whistleblowers is not allowed. The confidentiality of the whistleblower is maintained, and their identity is protected. In this context, retaliation means adverse conduct taken when an individual reports an actual or perceived violation of the Canyon Code of Ethics and/or practices that aren't allowed by this code.

Deliberate misreporting or reports only intended to cause harm will not be covered by the whistleblower protection, Canyon may then share whistleblower's name and take actions against them under the law.

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