Compliance Governance and Responsibility Policy

Organisation, Responsibilities, Controls and Reporting System

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This Policy defines how compliance is governed, documented and monitored at M-U-T Engineering. It supplements the Code of Conduct, the Anti-Bribery and Anti-Corruption Policy and the Compliance and Social Responsibility Policy.

Overall responsibility	Management
Operational coordination	Designated person responsible for compliance
Reporting channel	office@mut-e.at
Reporting cycle	At least annually and when circumstances require

1. Governance Principles

- Leadership by example and clear accountability by management
- Risk-based, proportionate and documented measures
- Appropriate independence of the compliance function
- Segregation of duties and the four-eyes principle for material decisions
- Protection of persons who report concerns in good faith
- Regular review and continual improvement

2. Roles and Responsibilities

Role	Core responsibility	Typical evidence

Management	Approval of policies and resources, tone from the top, decisions in high-risk cases, management review	Decisions, approvals, review minutes
Person responsible for compliance	Advice, risk assessment, registers, training, handling of reports, reporting	Risk register, annual report, training records
Project management	Implementation of control points, partner due diligence, documentation, escalation of risks	Project file, due diligence, approvals
Finance / Accounting	Invoice, accounting and payment controls; four-eyes principle	Payment approvals, supporting documents, reconciliations
Procurement	Objective selection, comparison of bids, conflict-of-interest review	Award memorandum, bid comparison
All employees and partners	Comply with the rules, disclose conflicts, report concerns, participate in training	Declarations, reports, attendance records

3. Compliance Risk Management

The person responsible for compliance conducts a documented risk assessment at least annually and before entry into new countries or business areas, major projects or material partner relationships. Each risk is assigned an owner, measures, deadlines and a status.

4. Control System

Minimum controls include business partner due diligence, conflict-of-interest declarations, documented procurement, evidence of performance before payment, four-eyes approvals, registers for gifts, hospitality and donations, and risk-based sample checks.

5. Compliance Control Points in the Project Cycle

Control points are integrated into digital project management at the following stages: proposal phase, partner selection, contract conclusion, project start, procurement, payments, acceptance, changes and project completion.

6. Reporting System and Investigations

Reports are received confidentially, documented, assessed for plausibility and investigated in accordance with a defined procedure. Allegations concerning management are referred to an independent external party.

7. Training and Communication

New employees and persons in risk-exposed functions receive induction training; refresher training is provided on a risk-based basis. Material partners are required to comply with the applicable standards.

8. Reporting and Management Review

At least annually, the person responsible for compliance reports on material risks, reviews, reports, incidents, training and outstanding actions. Management evaluates the adequacy and effectiveness of the system.

9. Document Control and Retention

Policies state their version, approval, effective date and review date. Records are retained securely in accordance with legal, contractual and project-specific retention periods.

10. Deviations and Improvements

Deviations are analysed, assessed for root cause and addressed through corrective actions, assigned responsibilities and deadlines. Repeated or material deviations are reported to management.

Annual Minimum Agenda

- Update of the compliance risk register
- Management review and approval of the action plan
- Review of policies and reporting channels
- Evaluation of reports, incidents and corrective actions
- Review of training, partner assessments and registers
- Definition of priorities for the following year