Version of: 17 July 2025

Responsible Disclosure Policy Accell Group B.V.

Accell Group B.V. makes bicycles, bicycle parts and accessories. Well-known bicycle brands in our portfolio include Haibike, Winora, Ghost, Batavus, Koga, Lapierre, Raleigh, Sparta, Babboe and Carqon. XLC is our brand for bicycle parts and accessories.

This vulnerability disclosure policy applies to any vulnerabilities you are considering reporting to us (the "Company") that are found in our websites, applications, or connected products.

We recommend reading this vulnerability disclosure policy fully before you report a vulnerability and always acting in compliance with it.

We value those who take the time and effort to report security vulnerabilities according to this policy. However, we do not offer monetary rewards for vulnerability disclosures.

Reporting

If you believe you have found a security vulnerability, please submit your report In English to us using the following link/email: responsible-disclosure@accell-it.com

In your report, please include details of:

- The website, IP, and/or page where the vulnerability can be observed.
- A brief description of the type of vulnerability, for example, “XSS vulnerability”.
- Steps to reproduce. These should be a benign, non-destructive, proof of concept. This helps to ensure that the report can be triaged quickly and accurately. It also reduces the likelihood of duplicate reports, or malicious exploitation of some vulnerabilities, such as sub-domain takeovers.

What to expect

After you have submitted your report, we will respond to your report within 5 working days and aim to triage your report within 10 working days. We’ll also aim to keep you informed of our progress.

Priority for remediation is assessed by looking at the impact, severity, and exploit complexity. Vulnerability reports might take some time to triage or address. You are welcome to enquire on the status but should avoid doing so more than once every 14 days. This allows our teams to focus on the remediation.

We will notify you when the reported vulnerability is remediated, and you may be invited to confirm that the solution covers the vulnerability adequately.

Guidance

You must NOT:

- Break any applicable law or regulations.
- Access unnecessary, excessive, or significant amounts of data.
- Modify or delete data in the Company's systems or services.

- Use high-intensity invasive or destructive scanning tools to find vulnerabilities.
- Attempt or report any form of denial of service, e.g. overwhelming a service with a high volume of requests.
- Disrupt the Company's services or systems.
- Submit reports detailing non-exploitable vulnerabilities.
- Submit reports indicating that the services do not fully align with “best practice” (for example missing security headers), or reports detailing functional issues such as user experience or user interface issues.
- Submit reports detailing TLS configuration weaknesses, for example “weak” cipher suite support or the presence of TLS1.0 support.
- Communicate any vulnerabilities or associated details to either the Organization or third parties other than by means described in this policy.
- Social engineer, ‘phish’ or physically attack the Company's staff or infrastructure.
- Use this policy if you are an employee, contractor, or other staff member working for Accell Group or any of its subsidiaries.
- Use this policy to report vulnerabilities relating to our suppliers or customers that are referenced or hyperlinked from our sites.
- Demand financial compensation to disclose any vulnerabilities.

You must:

- Always comply with applicable data protection rules and regulations and must not violate the privacy of the Company’s users, staff, contractors, services, or systems. You must not, for example, share, redistribute or fail to properly secure data retrieved from the systems or services.
- Securely delete all data retrieved during your research as soon as it is no longer required or within 1 month of the vulnerability being resolved, whichever occurs first (or as otherwise required by data protection law).

Legalities

This policy is designed to be compatible with common vulnerability disclosure good practice. It does not give you permission to act in any manner that is inconsistent with the law, or which might cause the Company or partner companies to be in breach of any applicable legal obligations.