

# Rules of Procedure in accordance with Section 8 (2) of the German Supply Chain Sourcing Obligations Act (LkSG)

## 1. Establishment and purpose of the complaints procedure

The company has set up an appropriate complaints procedure in accordance with Section 8 LKSG. The complaints procedure enables persons to point out human rights and environment-related risks as well as violations of human rights or environment-related obligations that have arisen as a result of the economic actions of a company lying in its own area of business or in that of a direct supplier.

## 2. Responsibility and accessibility

The complaints procedure is rested with the external entrusted attorney (ombudsman), who can be reached as follows:

Dr. Carsten Thiel von Herff, LL.M.  
Loebellstrasse 4  
D - 33602 Bielefeld

Tel: +49 521 557 333 0 / Mobile: +49 151 58230321  
E-mail: [vertrauensanwalt@thielvonherff.de](mailto:vertrauensanwalt@thielvonherff.de)  
Reporting platform: [www.report-tvh.com](http://www.report-tvh.com)  
Homepage: [www.thielvonherff.de](http://www.thielvonherff.de)

The entrusted attorney acts as an independent and autonomous lawyer. He is impartial and is not subject to any instructions by the company with regard to the substantive treatment of the matter. The entrusted attorney is bound to secrecy. If desired, he shall maintain the confidentiality of the identity of a person providing information.

## 3. Complaints procedure

The entrusted attorney receives any complaints and, if necessary, discusses the facts of the case with the person providing the information. The informant receives an acknowledgement of receipt in all cases.

The entrusted attorney examines whether a breach of duty within the meaning of the LkSG or a violation of other laws or internal rules may have occurred. Where sufficient indications of such a breach exists, he passes on the facts submitted to him in an admissible form to the company for investigation. With a view to not jeopardizing his impartiality, the entrusted attorney does not conduct any investigations himself.

The company follows up the information in compliance with the law and internal rules, taking into account the interests of all parties involved. The aim is for the investigation to be carried out swiftly and without major interruptions.

Persons affected by an investigation must be treated fairly and with respect. The presumption of innocence applies to all persons affected and the right to be heard must be granted. For this reason, any persons affected by an informant are informed as swiftly as possible about the information received and are advised of their rights to information and rectification. However, if there is a serious risk that notification would jeopardize the investigation of the information received, notification may be postponed until after the investigation has been completed or until the risk has ceased to exist.

Any legal assessment of the facts under investigation and the determination of appropriate measures to eliminate and prevent improper business practices are carried out by the company, which may consult the entrusted attorney for this purpose. Measures may include, for example, appropriate civil action or the involvement of an authority. Even if no violations are found in a specific case, proposals for changes to work and business processes as well as changes to organizational and behavioral rules may be appropriate.

The person making the report can obtain information on the status of the case from the ombudsman at any time. Three months after receipt of the report, s/he will receive feedback on the follow-up measures to the report. At the latest after completion of the process, s/he will be informed of the result by the ombudsman to the extent legally permissible.

## **4. Protection of the person providing the information**

The person providing the information is fundamentally protected from discriminatory or disciplinary action. Any retaliatory action directed against them will not be tolerated. Should any indication of retaliation against persons providing information arise, the entrusted attorney shall be contacted immediately.

Should the entrusted attorney have assured a person providing information of confidentiality, he shall not disclose that person's name and identity to the company or third parties without their consent. Should the entrusted attorney be questioned as a witness in criminal, civil or other proceedings, he shall only disclose the name and identity of the person providing the information if he is permitted to do so in writing by both the person providing the information and the company.

The wish of the person providing the information to protect his or her identity is opposed by the interest of the persons affected by the information in the disclosure of the facts. For this reason also, deliberate abuse of the opportunity to submit complaints and information will not be tolerated. The entrusted attorney should point out to the person providing the information during the first consultation that in the event of deliberate misuse of the complaints procedure, his or her identity may be disclosed to the company.

## **5. Privacy**

Compliance with the statutory retention obligations and the provisions of data protection law is ensured by the entrusted attorney. The personal data collected is limited to information on the

identity, function and contact information of the persons providing the information and the persons concerned, as well as to the other personal data that is absolutely necessary for processing the matter. In addition, only reported facts, processing details, follow-up of the report and audit reports are stored.

The retention period for personal data recorded in the course of the provision of information and investigations is two months after completion of the investigations. This period is extended accordingly if the conclusion of the investigation is followed by disciplinary or legal proceedings or other disputes for which the data must be used.

The data protection officer shall review the data protection conformity of the complaints procedure on a regular basis.

## **6. Effectiveness of the appeal procedure**

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis, for example if the company has to expect a significantly changed or significantly expanded risk situation in its own business area or in that of a direct supplier; for example, as a result of the introduction of new products, projects or a new business area.