

Rules of Procedure for the Complaint Process according to § 8 Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG)

I. Purpose and Scope

The Act on Corporate Due Diligence Obligations to Prevent Human Rights Violations in Supply Chains (Supply Chain Due Diligence Act – LkSG), which came into force on 01.01.2023, aims to better protect human rights and the environment in the global economy.

To achieve these goals, we have set up an effective complaint process according to § 8 LkSG. This is intended to prevent violations of the LkSG as much as possible or to detect them early in order to avoid potential negative consequences for those affected.

Through the complaint process, business partners, customers, and other third parties can provide information on violations of human rights and environmental obligations and the associated risks.

Human rights duties here include, among other things, the prohibition of child labor, protection against slavery, and also the prohibition of disregarding occupational safety. Environmental aspects include, on the one hand, substances that pose a risk to humans and the environment, and on the other hand, actions or circumstances that could potentially lead to human rights violations. Below, we have described the reporting channel, responsibilities, and the exact process of making a report through a procedural regulation.

II. Reporting Channel

The following communication channel is available:

- <https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/complaints-portal/public-complaints/index.html#/waldner/DEFAULT/complaint/new>

Reports should be made in German or English.

III. Procedure

Below, we would like to outline the exact process for filing a report.

a) Receipt of the Notification

Upon receipt of the report, the person providing the information will receive a confirmation of receipt from the reporting office.

b) Review, Fact-Finding, and Remedial Measures

After that, the report will be carefully checked for plausibility. If further information is needed, the reporting office will contact the person providing the information to obtain additional details.

If there are concrete indications of a violation, an internal investigation and possibly further appropriate follow-up or remedial measures (e.g., improvement of internal processes) may be carried out.

The information is handled as part of a confidential process, especially with regard to the identity of the reporting person, and while maintaining data protection considerations. Furthermore, the principle of proportionality is observed.

The protection of the reporting person from punishment or disadvantage due to a complaint is ensured in accordance with applicable public law, civil law, and criminal law provisions. As much as possible, contact is maintained with the reporting individuals according to the respective legal requirements, and the matter is discussed if necessary. Information received is only passed on to those people who must be involved in handling the report, as far as required to investigate the matter.

Complaints should basically be processed and resolved within three months of receipt.

All incoming notices are documented, stored, and deleted in accordance with legal regulations.

c) Effectiveness Check

Our complaint process is regularly reviewed for its effectiveness and improved if necessary.