

# Rules of procedure for the complaints procedure pursuant to Section 8 of the Supply Chain Due Diligence Act (LkSG)

## Introduction

EGV|AG are committed to the observance of human rights and the protection of the environment. It is the declared goal of the company's management to respect, protect and promote human rights and the environment along the entire value chain.

Violations of internationally enshrined human rights and national and international environmental regulations will not be tolerated. EGV|AG takes appropriate and effective measures to identify and verify human rights and environmental risks in its own business area and throughout the supply chain and to prevent the realisation of risks.

Human rights and environmental due diligence obligations include the establishment of an effective complaints mechanism through which whistle-blowers can report violations, risks, and other issues. These Rules of Procedure explain the process of submitting and processing incoming reports. It sets out how the complaints procedure can be achieved, who is responsible for the complaint's procedure, what the concrete procedure looks like from receipt of a complaint and what measures are taken to protect the whistle-blowers. The aim of the complaint's procedure is to enable whistle-blowers to contact them easily and securely, so that human rights and environmental risks and violations in the supply chain can be identified at an early stage and violations that have occurred can be minimized and eliminated.

## What is the purpose of the complaint's procedure?

The complaints procedure is intended to offer every person or group of persons the opportunity to submit relevant complaints or information to EGV|AG and thus draw attention to human rights and environmental risks (**early warning system**).

Persons or groups of persons are given the opportunity to inform about the suspicion of a violation of the law, so that damage can be immediately averted or minimized (**access to appropriate remedy**).

## What types of complaints or reports can be made?

They can provide complaints or information regarding human rights and environmental risks as well as violations of human rights-related or environment-related obligations (cf. § 2 para. 2 – 4 LkSG) that have arisen because of EGV|AG economic activities in its own business area or in the supply chain.

## Who can make complaints or reports?

Both directly affected employees of EGV|AG and directly affected external persons can submit information. However, persons who are not directly affected can also provide information on risks and breaches of the duty of care. This can also be done on behalf of persons directly affected.

## How can I make complaints or reports?

Complaints and reports can be submitted at any time in two separate ways. All complaints and indications, regardless of how they are received by EGV|AG, will be processed immediately and in the same way.

Reports can be sent electronically and in writing to the Complaints Management as follows:

Electronic reporting system in which complaints or notices can be entered into a web application. It can be used in 7 languages. The reporting system can be found at [www.whistle-blow.org/EGV](http://www.whistle-blow.org/EGV) attainable.

Complaints and reports are sent by post to:

EGV|AG  
Werler Straße 42  
44239 Unna

Both channels ensure that the report is handled confidentially. The electronic whistleblowing system enables the creation of a mailbox through which the whistle-blower can communicate with EGV|AG while maintaining the confidentiality of their identity.

We do not charge you any fees for submitting your report and processing it by us.

### **Who handles the complaints and reports?**

The complaint is processed by a complaint management function set up specifically for this purpose by the Internal Audit department. This function is instructed to act impartially and acts without being bound by instructions. In addition, the employees entrusted with this function are obliged to maintain confidentiality, are trained accordingly, and are provided with sufficient time resources.

If necessary, the Complaints Management will call in other departments that are needed to respond to your report. In this case, your report will be forwarded anonymously. If the facts of the case are such that it does not appear possible to process an anonymous report outside of the above-mentioned complaints office, we will contact you separately to find an acceptable solution.

### **What complaint content can be used to support effective processing?**

With the following voluntary information, you support us in the effective processing of your complaint:

- Your full contact details (address, telephone, e-mail address if applicable)
  - Name and address of the affected (affiliated) company or supplier
  - Detailed description of the facts of the case and the purpose of your complaint
  - Records and documents (if available)
  - Mention of the human rights or environmental risk to which your report relates (cf. § 2 para. 2 – 4 LkSG)
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- What would the complainant do to remedy the situation?
  - Indication of whether EGV|AG should deal with the complaint confidentially or transparently.

### **How does the complaints procedure work?**

- After a complaint or report has been received, the whistle-blower will receive a confirmation, which will be received within approximately 7 days.
- During the entire procedure, EGV|AG is in contact with the whistle-blower, if this is desired and there is a possibility of contact.
- A confirmation of receipt is not required if there is no possibility of contacting the whistle-blower (e.g., anonymously by post)
- As a matter of principle, the complaint or information is first examined by the Complaints Management to determine whether the reported facts represent a human rights or environmental risk or a violation of human rights or environmental obligations. It also checks which company or supplier is affected by the notification.
- The next step is to clarify the facts of the case, which will take place within three months. If, during the clarification of the facts, it is determined that a violation of human rights and/or environmental obligations is imminent or is already taking place, remedial measures will be initiated immediately.
- The staff involved in the grievance process will monitor whether and to what extent the remedial action is being implemented.
- In addition, a proposal for further action is developed based on the findings or clarification of the facts.

### **How are whistle-blowers protected from discrimination and reprisals because of a complaint or tip-off?**

The protection of whistle-blowers from discrimination or punishment because of complaints or tips made is an important part of our complaint's procedure.

The following measures serve to protect the whistle-blower:

- All complaints and reports are only handled by a small group of selected and specially trained employees.
- All information, such as personal data and other information that allows conclusions to be drawn about the identity of the whistle-blower, will be treated confidentially. This also applies after the conclusion of the procedure.
- In accordance with legal requirements, the company's internal documentation is stored for seven years and then destroyed.

Depending on the nature of the facts you have raised, EGV|AG will take tailor-made measures to protect against discrimination or punishment because of a complaint.