

## Rules of procedure for the complaints procedure under the German Supply Chain Due Diligence Act (LkSG)

Although Hohenstein is not obliged to do so by the Supply Chain Due Diligence Act (LkSG) due to the size of the company, we observe human rights and environmental due diligence obligations in our supply chains and our own business area in an appropriate manner. To this end, we have expanded our whistleblower system for the complaints procedure in accordance with Section 8 of the LkSG. The procedure enables internal and external persons to report human rights and environmental risks and violations of human rights or environmental obligations. This document describes the complaints procedure in accordance with the LkSG in more detail.

### 1. What kind of complaints or indications can the procedure be used for?

In the case category "Violation of human rights and environmental obligations or related risks", complaints and information on the following risks or violations of obligations can be reported:

- **Human rights risks and breaches of duty:** Child labor, forced labor, slavery, disregard for occupational health and safety and work-related health hazards, disregard for freedom of association, unequal treatment, withholding of appropriate wages, destruction of natural resources through environmental pollution, unlawful violation of land rights, use of private or public security forces in violation of human rights, other conduct that seriously impairs protected legal positions.
- **Environmental risks and breaches of duty:** Failure to comply with environmental protection prohibitions (Minamata Convention, Stockholm Convention, POPs Convention, Basel Convention).

Complaints and reports relate to risks or breaches of duty that have arisen as a result of the **business activities** of Hohenstein, including its subsidiaries, in its own business area or of a direct or indirect supplier.

### 2 Which complaint channels can be used to submit information or complaints to the procedure?

The central channel for complaints and reports is an electronic whistleblower system. This can be accessed online via the following link and is free of charge for whistleblowers:

<https://app.whistle-report.com/report/7a8fca76-0e2b-4458-a8fd-af1b853477a1>

However, information can also be submitted via the telephone channel of this whistleblower solution:  
+49 800 3800 999

External persons are informed about this on the homepage ([www.hohenstein.de/de/ueber-uns/compliance](http://www.hohenstein.de/de/ueber-uns/compliance)). Employees are also informed about the existing complaints channel via the intranet.

### 3 How does the complaints procedure work?

Complaints and tips are reported by the whistleblowers in the electronic whistleblowing system in German or English. The whistleblowers receive a confirmation of receipt if they have entered contact details in the whistleblowing system so that they can remain in contact with the whistleblowers anonymously.

#### 3.1 The clearing house and its tasks

Information submitted via the electronic whistleblower system first reaches the so-called "reporting office", which is staffed by two employees from the Compliance department.

The Reporting Office has the task of conducting a cursory examination to determine whether a report falls into the case category "violation of human rights and environmental obligations or related risks".

The Reporting Office clarifies the facts of the case by making inquiries with the whistleblowers to such an extent that it can determine whether there is a concrete initial suspicion of a violation of human rights and/or environmental obligations or a corresponding risk within the meaning of the LkSG.

If the investigation does not reveal any concrete initial suspicion, the proceedings will be discontinued and the whistleblowers informed accordingly. No other persons will be informed of the facts described in the report.

If the Reporting Office concludes that there is a concrete initial suspicion of a breach of human rights and/or environmental obligations or such a risk, the information, including further information available to the reporting office, is forwarded to the responsible internal officers at Hohenstein. Further processing and clarification are then carried out by the legal department.

The procedure at the clearing house is completed with the announcement of the audit result to the whistleblowers or the forwarding of the process to the internal representatives.

### 3.2 Internal representatives and their tasks

The persons in the legal department responsible for processing the reports can act independently and impartially and are not bound by instructions. They are also obliged to maintain confidentiality.

If the initial suspicion is confirmed by further processing and a grievance is identified in the company's own business area, corrective measures are taken with the involvement of the relevant internal departments in order to end the risk or violation immediately and prevent it from occurring again.

If the tip-off or complaint relates to a direct supplier, contact is made with the supplier via the responsible purchasers and discussions are held with the supplier. If the initial suspicion is confirmed, a concept for ending or minimizing the violation is drawn up and implemented with the involvement of Purchasing and the supplier. The same procedure applies in the event of indications or violations at an indirect supplier.

The whistleblowers are contacted by the legal department for any further queries and informed about the processing of the matter and the outcome. The duration of the procedure may vary depending on the scope and complexity of the complaint.

### 3.3 Effectiveness of the complaints procedure

This procedure is reviewed for effectiveness at least once a year or on an ad hoc basis. If necessary, adjustments are made to the procedure or corrective measures are taken.

## 4. How is the effective protection of anonymity and against discrimination or punishment based on a complaint ensured?

**Protection of anonymity:** The whistleblower system is administered online via a standardized system equipped with a high level of data and access security. The system is technically designed in such a way that there is no possibility for Hohenstein, its employees or the Reporting Office to identify the whistleblowers. Processing takes place via external servers from a third-party provider, which are operated in Germany and comply with the highest security class.

The Reporting Office and - once the information has been released - the internal officers are technically able to communicate with the whistleblowers via the system while maintaining anonymity. In this way, any further necessary questions can be asked. Whistleblowers also have the option of deliberately choosing not to remain anonymous.

**Protection of own employees:** Whistleblowers will not be personally or legally disadvantaged for reporting a LkSG-relevant grievance. Similarly, reports against employees that turn out to be insubstantial may not lead to personal or legal disadvantages for the falsely reported person. Personal data may be stored or retained for a maximum period of seven years.

Bönningheim, 21.02.2024

Hohenstein  
Schlosssteige 1 | D-74357 Bönningheim  
T. +49 7143 271-898  
Mail: [info@hohenstein.com](mailto:info@hohenstein.com)