

GROZ-BECKERT®

Rules of procedure

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

1. What reporting channels are there at Groz-Beckert?

Groz-Beckert has set up various reporting channels to give whistleblowers the greatest possible flexibility and simplify the reporting process. Whistleblowers can submit their tip

- by post,
- by e-mail to the mailbox tell.us@groz-beckert.com set up especially for this purpose,
- via the "tell us" digital whistleblowing system (see section 2 below),
- to the telephone hotline set up specifically for this purpose (direct and as a voice message)
+49 7431 10 3505
- or using a combination of the above-mentioned reporting channels.

A personal meeting is also possible at the request of the whistleblower.

2. What is the "tell us" digital whistleblowing system?

With the "[tell us](#)" digital whistleblowing system, Groz-Beckert offers the opportunity to address tips digitally, either by voluntarily providing personal data or anonymously. Groz-Beckert uses "whistleOps by 2B Advice" for this purpose. This is a platform that includes a ticket system for managing the case, is GDPR-compliant and meets all the requirements of the European Whistleblower Directive.

The data is stored on servers in a high-security data center in Germany. Personal data entered into the whistleblower system is stored in a database operated by 2B Advice. All data is encrypted, password-protected and stored in a secure location so that access to the content of the electronically stored data is restricted to a narrow circle of authorized persons at Groz-Beckert. 2B Advice cannot view the content of the data stored electronically in the database. As long as the whistleblower do not enter any data that allows conclusions to be drawn about his person, the whistleblower system automatically protects his anonymity by means of a certified procedure that is secured by comprehensive technical and organizational measures.

Via the "tell us" whistleblower system, the tip will always and exclusively be addressed to the Central Compliance Function of Groz-Beckert KG.

3. Who hears/reads the clues?

Groz-Beckert has introduced a Compliance Management System in which the Legal and Insurance Department has assumed the role of Central Compliance Function. Whistleblower are therefore asked to send any tips by post to this department (address: Groz-Beckert KG, Z-LI, Parkweg 2, 72458 Albstadt). The telephone hotline as well as the e-mail address tell.us@groz-beckert.com are received directly by the Central Compliance Function.

Even though the Central Compliance Function will treat tips received via the aforementioned channels as strictly confidential, the anonymity of whistleblowers cannot be fully guaranteed and there is no possibility of queries in the case of anonymous tips sent by post. In order to effectively protect whistleblowers, Groz-Beckert offers the digital whistleblowing system "tell us" as a secure communication platform for submitting anonymous tips.

4. Can a tip be submitted anonymously?

Yes, in its digital whistleblower system "tell us" Groz-Beckert offers the option of submitting tips completely anonymously.

If whistleblowers provide personal data on a voluntary basis, the personal data provided will exclusively be used to investigate the tip made by the whistleblower and will be retained for as long as is necessary to clarify the tip and its final processing, including the rectification of any identified deficiencies and the handling of any associated legal proceedings. Thereafter, personal data will only be retained if this is required or permitted by law due to statutory, official or contractual retention obligations.

5. What are the next steps after a tip has been submitted?

Upon receipt of the tip (which will be confirmed within seven days), Groz-Beckert's Central Compliance Function will check whether an in-depth investigation is required. An investigation can be carried out by internal or external investigation specialists.

The internal investigation is reserved for the central compliance Function, which decides whether internal units (e.g. the responsible management, which also has the task of remedying any deficits discovered in the course of the whistleblowing process) should be involved, depending on the content of the whistleblowing tip and in strict compliance with confidentiality. If the tip involves a subsidiary, the responsible departments in these companies are notified, unless the whistleblower has expressly requested for them not to be involved. The central compliance Function also decides whether to involve external specialists. Processing and following up on tips in the context of the German Supply Chain Duty of Care Act (LkSG) are the responsibility of the Purchasing department.

External specialists that Groz-Beckert involves (such as lawyers, auditors or forensic experts who investigate the tip on behalf of Groz-Beckert) are bound by contractual or statutory confidentiality obligations to keep the information disclosed by the whistleblower confidential.

As part of the internal or external investigations, persons about whom a tip regarding indications of a compliance violation has been received, may be informed and heard. If relevant or required by law, these persons will be given the opportunity to comment on the information during the course of the investigation. In addition, Groz-Beckert may be legally obliged to make information on compliance violations available to certain government agencies, in

particular state investigating authorities or courts. In the event of obligations to provide information and surrender information or in the event of seizures Groz-Beckert cannot withhold the information provided by the whistleblower.

The results of the investigation are then evaluated by the responsible department. In the event of misconduct being identified, the department then makes a suitable recommendation for sanctions to the relevant management.

Whistleblowers are informed about the outcome of the investigation of the reported violation and about any measures taken as a result within a reasonable period of time but at the latest within 3 months after the confirmation of receipt of the tip. The obligation to provide feedback also applies if no result of the investigation is yet available because of longer investigations. In this case, the feedback is limited to information on the current status of the investigation.

Once the review has been completed, the information is documented in compliance with the confidentiality requirement and deleted three years after completion of the procedure.