

Rules of procedure for the complaints procedure under the Supply Chains Act

in accordance with section 8 (2) of the German Act on Corporate Due Diligence Obligations in Supply Chain Duty of Care Act [Lieferkettensorgfaltspflichtengesetz - LkSG]

Whenever someone notices actual or potential problems in the field of human rights or environmental right, they should be able to report them by means of our complaints procedure. That can be problems in our supply chains, but also in our own area of activity. These rules of procedure describe the issues to which reports can relate, how reports can be submitted and what happens after a report has been submitted.

We will be happy to answer any questions about the process, either directly via the reporting system or via the contact option indicated below in "In charge for the complaints procedure".

Scope of application

In general, all issues relating to violations of human and environmental rights can be reported via this reporting system.

Some concrete examples:

Human rights violations:

- Child labour
- Forced labour and slavery
- Discrimination and unequal treatment
- Disregard for freedom of association
- Withholding of adequate wages
- Hazardous working conditions
- Unlawful forced evictions or the unlawful seizure of land
- Unlawful use of private or public security forces
- Pollution of water, soil and air, which can contribute to a violation of human rights

Violations of environmental law:

- Use of mercury (as under the Minamata Convention)

- Use of persistent organic pollutants (as under the Stockholm Convention)
- Environmentally un-sound storage, handling, import and export of hazardous waste (as under the Basel Convention)

Submitting reports and complaints

We recommend submitting reports via our digital reporting system:

<https://www.bkms-system.com/schoerhubergroup>

Reports can be made in your preferred language. Reports can be submitted around the clock. At their request, informants can remain completely anonymous. Even if informants disclose their identity, the confidentiality and protection of personal data is guaranteed in each case.

The system allows informants to remain in contact with our company even after submitting a report and even if they remain anonymous. Of course, the use of the system is free of charge for the informant.

Course of the procedure

The processing of all incoming reports follows a structured process, which is described below.

1. Receiving the report

Upon receipt of the report, informants will be sent a confirmation of receipt within seven days.

2. Checking the report

Then, the content of the report is checked. Questions may arise during this phase and are clarified with the informant. Depending on the content, the next steps to be taken are determined. If the complaint is rejected, the informant receives a statement of reasons.

3. Investigating the facts

If the procedure continues, the issue is discussed and investigated with the informant. A procedure for finding an amicable resolution may be an option.

4. Developing a solution

A proposal for a solution is developed in close contact with the informant. If relevant, agreements on compensation are made.

5. Corrective measures

Corrective measures may be required to resolve reported problems. If corrective measures are agreed, they are implemented and followed up.

6. Review and conclusion

The result of the procedure is evaluated together with the informant. This particularly concerns the informant's satisfaction with the course and outcome of the procedure.

The duration of the procedure heavily depends on the facts of the case and can range from a few days or weeks to several months. We generally endeavour to bring the procedure to a satisfactory solution as efficiently as possible. In addition, we always endeavour to keep the informant updated about the measures taken and the further course of events. We therefore recommend that informants using the digital reporting system log in regularly and check their own case for new messages.

Amicable resolution

For some complaints, it may be advisable to involve a neutral and mediating third party. Our aim is to help find a solution that satisfies all parties. If it becomes apparent during the procedure that an amicable resolution could make sense, we will endeavour to involve such a neutral party.

In charge of the complaints procedure

The following department is in charge and centrally responsible for our complaints procedure, the primary contact person(s) for questions or comments are:

Schörghuber Stiftung & Co. Holding KG
Legal & Compliance
Möhlstrasse 10
81675 Munich
Germany
E-Mail: compliance@schoerghuber.group
Phone: +49 89 3074917-0

We also recommend that informants use the option of communicating via our digital reporting system to address questions or comments directly to the person in charge.

Protection from any discrimination or punishment

We endeavour to ensure that informants are not disadvantaged or penalized as a result of their report. Retaliation due to complaints or reports will not be tolerated. If the informant

is employed by our company, this includes protection against dismissal, demotion, suspension, threats, harassment or other forms of discrimination in relation to the employee's terms or conditions of employment.

If the informant is employed by a supplier, for example, we cooperate with the supplier to ensure that the informant enjoys a comparable level of protection. In order to ensure that the informant is not subject to any discrimination, punishment or similar retaliation, we endeavour to keep in contact with the informant even after conclusion of the procedure.

Munich, this 20th day of March 2023