

## **Rules of procedure for complaints according to § 8 Supply Chain Due Diligence Act (LkSG)**

RWS GmbH (hereinafter referred to as "RWS") is committed to acting responsibly with regard to respecting and strengthening internationally recognized human rights within its own business areas and through appropriate management of its supply chains. A fundamental element of these due diligence obligations is the establishment of an effective complaints process through which information on human rights and environmental risks or violations can be submitted.

These rules of procedure provide information on the main components of the complaints process, access to the process and its availability as well as responsibilities. It also provides information on how incoming reports and complaints are handled, i.e. how the complaints procedure is applied in practice.

### **1. Objective**

The complaints procedure enables persons (employees and third parties) to provide information on human rights or environmental risks and on the suspected violation of human rights or environmental obligations that have arisen as a result of the actions of RWS in its own business area or in the supply chain.

### **2. Authorized information providers**

The reporting office accepts information and complaints from employees as well as from external persons, e.g. employees of customers or suppliers or other third parties.

### **3. Reporting channels**

Complaints and reports can be submitted at any time via various channels. All complaints and reports, regardless of how they are received by RWS, are processed immediately and in the same way:

- By the electronic whistleblowing system:  
RWS provides a secure electronic whistleblowing system, available in German and English. The whistleblowing system can be accessed via the following link:  
<https://RWS.integrityline.com>
- By mail:  
RWS GmbH  
Attn: Compliance Officer .  
Kronacher Straße 63,  
90765 Fürth, Germany
- By email  
Email: [compliance@RWS.com](mailto:compliance@RWS.com)

All channels ensure that reports are handled confidentially. The electronic whistleblower system enables a mailbox to be set up through which the whistleblower can communicate with the Compliance department while keeping their identity confidential.

#### **4. Complaints procedure**

As soon as a complaint or notification has been received, the whistleblower will receive a confirmation of receipt within 7 days at the latest, provided the contact details are available. Throughout the entire process, RWS will remain in contact with the whistleblower if this is desired and a contact option is available. Complaints or reports received are first thoroughly examined in order to clarify whether the reported facts represent a human rights or environmental risk or a violation of human rights or environmental obligations.

If there is an initial suspicion of relevant misconduct, an internal investigation is carried out to clarify the information. The aim is to verify, understand and objectively confirm or refute the reported facts as effectively and efficiently as possible.

An internal investigation is carried out directly by RWS Compliance or is coordinated by RWS Compliance with the relevant specialist departments and, if necessary, the management. As part of an internal investigation, dialog with the whistleblower may also be sought in order to clarify any open issues.

The results of the internal investigation are documented in writing in a report and, based on this, appropriate measures are recommended with responsible parties and a timetable. Measures can be of a preventive nature as well as corrective measures or sanctions. The whistleblower is generally informed accordingly within a period of 3 months from receipt of the confirmation of receipt (provided the whistleblower's contact details are available). Feedback will only be provided to the extent that internal investigations are not affected and the rights of the persons concerned are not impaired.

The employees involved in the complaints process follow up on whether and to what extent any remedial measures have been or are being implemented.

#### **5. Review and improvement**

RWS strives to continuously improve the procedures for whistleblower reports and internal investigations. To this end, usage data, experience and constructive feedback from the whistleblowing process are used at least once a year, or on an ad hoc basis if required.

#### **6. Protection of the whistleblower**

Provided that the whistleblower acts in good faith, i.e. has a reasonable suspicion, a report of violations or suspected cases must not result in any disadvantage for the whistleblower, even if a suspicion proves to be unfounded. Direct or indirect retaliatory measures due to a (suspected) report will not be tolerated and constitute a violation that can be reported. This also applies to the threat or attempt of discrimination.

It is also a violation if a person obstructs the submission of a report or impedes or prevents the clarification of a report.

All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, will be treated confidentially. This also applies after the proceedings have been concluded.