

Rules of procedure for the complaint procedure in accordance with the Supply Chain Due Diligance Act

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Pfleiderer promotes a culture of openness, trust, and transparency. To give our employees, business partners and other third parties the opportunity to inform us of grievances in our own business area or our supply chain, we have set up a whistleblower system. Only by becoming aware of possible unlawful acts we can work to minimize or prevent them.

The most important information on the complaint procedure and its process is described below.

1. Reports that can be submitted via the complaint procedure

Information of any kind relating to possible violations of laws and/or regulations, including human rights or environmental risks or violations, can be reported to Pfleiderer Group via the complaint procedure. These may concern Pfleiderer's own business area or its supply chain.

2. Available complaint channels and handling of reports

Our employees, business partners and other third parties have the option of reporting via our web-based whistleblower system at the following link: [Introduction \(bkms-system.com\)](https://www.pfleiderer.com/bkms-system.com).

The system is available in German, English and Polish, but a report can be submitted in any language and will be translated if necessary. A report via the web-based whistleblowing system can also be submitted by the whistleblower anonymously. The processing of incoming reports using the web-based whistleblowing system ensures that the reports received are handled confidentially. The web-based whistleblower system offers the option of creating a mailbox via which communication between the whistleblower and the company can take place (even in the case of anonymous reports).

Incoming reports are processed by the employees of the Legal and Compliance Department. In performing this task, they are impartial, independent, and bound to secrecy. Furthermore, data protection regulations are complied with and the rights of the persons concerned are safeguarded.

Our employees can also choose to report via their managers, the works council, the HR departments, or the Legal and Compliance department.

3. Protection of whistleblowers

The protection of whistleblowers is an elementary component of our complaint procedure. We do not tolerate reprisals against people who report actual or suspected misconduct in good faith. If you feel that you have experienced negative consequences in connection with a report you have made, please report this via our web-based whistleblowing system or, if you are employed by us, via the other reporting channels mentioned above. Such reports will also be reviewed and processed in accordance with these rules of procedure.

4. Course of the complaint procedure

Receipt of the report

Once a report has been received in our web-based whistleblower system, its receipt is documented internally, and the whistleblower receives a confirmation of receipt within seven days.

Check of the report

The responsible persons will first check whether sufficient information is available to investigate the reported facts. If this is not the case, the whistleblower will be contacted if possible, to obtain further information. If sufficient information is not available and the whistleblower cannot be contacted, the case will be closed.

Clarification of the facts

The facts of the case are examined by the responsible persons. Care is always taken to ensure that the identity of the person providing the information remains confidential. If contact can be made and this is necessary and useful for clarifying the facts of the case, the responsible persons will discuss them together with the whistleblower and obtain further information if necessary.

If the clarification of the facts reveals that there are no human rights and/or environmental risks or violations in the company's own business area and/or at suppliers, the case will be closed. If contact can be made, the whistleblower will be informed of this, stating the reasons.

Solution finding

If the clarification of the facts reveals that human rights and/or environmental risks or violations exist or are imminent in the company's own business area and/or at suppliers, a proposal for further action is drawn up, in particular defining preventive and remedial measures. If it is possible to make contact and this is necessary and expedient for the development of a solution, the whistleblower will be involved; in any case, the whistleblower will be kept informed.

Implementation and follow-up

The responsible persons will follow up on the implementation of the proposed solution.

Conclusion of the procedure

We strive to conclude each case promptly, although the individual procedural steps can vary significantly due to the different nature of the circumstances. We endeavor to process and resolve every case as quickly as possible.

If contact can be made, the whistleblower will be informed that the case has been closed.