

GOLDBECK GmbH

Rules of procedure for the complaints procedure in accordance with the German Supply Chain Due Diligence Act (LkSG)

1 Introduction

GOLDBECK GmbH and its affiliates are committed to respecting human rights and protecting the environment. It is the declared goal of the enterprise's management to respect, protect and promote human rights and the environment along the entire value chain. Violations of internationally anchored human rights and of national and international environmental protection regulations will not be tolerated. GOLDBECK GmbH takes appropriate and effective measures to identify and verify human rights and environmental risks in its own business area and throughout the supply chain to prevent the realization of risks. Human rights and environment-related due diligence obligations include the establishment of an effective complaints procedure through which people can report violations, risks, and other issues.

These rules of procedure explain the process of submitting and processing incoming indications. It sets out how the complaint procedure can be accessed, who is responsible, what happens after the receipt of a complaint, and what measures are taken to protect people, who use the procedure. The aim of the complaint procedure is to establish an easily accessible and secure way of communication, so that human rights and environmental risks and violations within the company and at business partners, particularly in the supply chain, can be identified at an early stage and any violations that have occurred can be minimized and eliminated.

2 Addresses and Scope of Application of the Complaints Procedure

The complaint procedure is publicly accessible and available to all groups of people, such as own employees, communities in the vicinity of own locations, employees of business partners and external stakeholders (NGO's, trade unions, etc.) –whether in Germany or abroad. The complaint procedure enables persons to report human rights- and environment-related risks as well as possible violations of the GOLDBECK Compliance Guidelines and locally applicable laws, which have arisen due to the economic actions of GOLDBECK GmbH and/or its dependent affiliates or in the supply chain.

3 Complaint Procedure

3.1 Who is Responsible for the Complaints Procedure?

Only employees who act impartially, are bound to secrecy and are not subject to any instructions within the framework of the complaint procedure, are responsible for receiving and processing information.

The GOLDBECK Compliance Manager is the contact person for the Complaint Procedure System of GOLDBECK GmbH and its dependent companies:

GOLDBECK GmbH
LkSG-Meldestelle
Ummelner Straße 4-6
33649 Bielefeld
compliance@goldbeck.de

3.2 How to submit a complaint?

If a person would like to submit an indication or a complaint, in particular with regard to human rights or environmental risks or violations, because he or she is affected themselves or are aware of an incident, the complaint procedure of GOLDBECK GmbH is available online.

- Complaint Procedure: Communication and the exchange of documents take place confidentially and securely via a separate system. Persons, who submit a complaint, can remain anonymous if they wish and if this is legally possible. A notice can be submitted using the following link:

Complaint Procedure: <https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/supplier-os-hub/public-access-app/complaint.html#/public/goldbeck/goldbeck/complaint/new>

Complaints can be accepted online in text form and – if necessary – translated into the working language of the Complaint Procedure (German or English). Upon request, GOLDBECK will endeavour to communicate in the language of the reporting person but cannot guarantee this. In general, the processing takes place in German or English. There are no costs of usage for the reporting person.

3.3 What can be reported?

Any potential misconduct in the company or along the supply chain can be reported to the Complaint Procedure. The reporting channels are used in particular to receive reports on:

- Prohibition of child labour
- Prohibition of forced labour and any form of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association - freedom of association and right to collective bargaining
- Prohibition of unequal treatment in employment
- Prohibition of withholding an adequate wage
- Destruction of the natural basis of life through environmental pollution
- Unlawful violation of land rights
- Prohibition of hiring or using private or public security forces for the protection of the entrepreneurial project which can lead to impairments due to a lack of instruction or control
- Ban on the production, use and/or disposal of mercury (Minimata Convention)
- Ban on Persistent Organic Pollutants (POP Convention)
- Prohibition of non-environmentally safe handling, collection, storage, and disposal of waste according to the regulations (POP Convention).
- Disregard for data protection
- Prohibition of theft/ embezzlement/ infidelity includes the misappropriation of company property or funds for the personal gain of an individual or another organization, or the improper use of company funds.
- Disregard for competition and antitrust law
- Prohibition of corruption
- Disregard for product safety
- Prohibition of disclosure of trade secrets
- Prohibition of fraud
- Prohibition of financial fraud/money laundering
- Prohibition of accounting fraud
- Failure to comply with environmental regulations
- Other violations including any act or omission that violates the company's Code of Conduct or applicable laws and regulations

3.4 What Information should a complaint contain?

For processing purposes, it is helpful to provide a description of the facts of the case that is as detailed as possible and includes the following information:

- ✓ *What law or internal regulation was violated?*
- ✓ *What happened?*
- ✓ *Where did it happen?*
- ✓ *In which organization did the violation occur?*
- ✓ *Which goods are related to the violation?*
- ✓ *What is your relationship to the business partner involved?*
- ✓ *Is the violation still ongoing?*
- ✓ *When did the incident occur? Is there any supporting documentation? Photos, videos, documents, etc.*

- ✓ *What should be the further contact? Provide contact details for further communication or express the wish for anonymity or the greatest possible confidentiality, e.g. no disclosure of the name of the person providing the information or making the complaint in the course of the investigation*

The above information facilitates and accelerates the proper processing of a complaint. The list is therefore an aid in formulating a complaint. However, it is not prerequisite for processing that a complaint contains information on all the above points.

4 Procedure

4.1 What happens after the complaint is given?

After receipt of an indication, the person providing it receives a confirmation of receipt, an automatically generated indication-ID, and the option of assigning a password. In this way, an anonymous exchange can be guaranteed at all times.

4.2 How is the complaint examined?

After the information has been receipt, it will be examined centrally by the responsible person. Information about affiliated companies of GOLDBECK GmbH may be forwarded to the person responsible for processing at the company concerned. The information is only passed on to the extent required for the case.

In a first step, the respective competent body shall examine the plausibility and validity of the complaint insofar as there are sufficient indications based on the submission that there are or have been violations of the rules or whether there could be relevant risks according to the German Supply Chain Due Diligence Act (German: Lieferkettensorgfaltspflichtengesetz). The complaint procedure System of GOLDBECK GmbH may not be used for false accusations or to report knowingly false information. If it is possible to contact the person providing the information, the matter will be discussed, if necessary, together with the respective person for investigating the indication. If a violation against human rights- or environmental-related obligations is identified, the processing person immediately initiates corrective actions. If a complaint reveals a human right- or environmental risk without a violation having occurred, appropriate preventive measures are initiated. Indications are considered as part of the risk analysis. The results of the indication examination are communicated to the person providing the information. If necessary, further steps are discussed with the reporting person.

4.3 What are possible outcomes of the procedure?

Every complaint is taken seriously by GOLDBECK and is subject to an examination. Depending on the complaint submitted, appropriate preventive and corrective measures are taken to counteract a possible violation in an appropriate manner and thus to end or minimize it. This may involve changes in business relationships, personnel, or process changes. The effectiveness of the measures taken is reviewed regularly.

5 Anonymous submission of a complaint

In principle, complaints can be submitted anonymously. When anonymous complaints are submitted, no data is recorded that would allow conclusions to be drawn about the identity of the person submitting the complaint. If the person submitting the complaint anonymously provides information that allows conclusions to be drawn about his or her identity, the information will be treated confidentially.

6 Confidential submission of a complaint and protection against discrimination or punishment

Furthermore, when a tip is submitted, the confidentiality of personal data and other information that allows conclusions to be drawn about the identity of the person providing the tip is guaranteed. Only the person responsible for processing and assigning the notice can read the contents of it. The submission of a complaint does not entail any negative consequences for the person submitting. An anonymous exchange during the entire complaint procedure is possible (see paragraph 5).

7 Documentation of complaints

Pursuant to Section 10, Paragraph 1, Sentence 2 of the German Supply Chain Due Diligence Act, complaints are kept for seven years.