

Rules of Procedure for the complaint procedure pursuant to Section 8 of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

As a family-run group of companies, Scheidt & Bachmann contributes to the development of sustainable and safe mobility with its various business divisions and its innovative products and systems. As part of our international business activities, we are aware of our corporate responsibility within the global value chain. Our actions are geared towards ensuring that the impact of our business activities and those of our suppliers are in harmony with people and the environment. Our goal is therefore to strengthen human and environmental rights along our value chain and to prevent, mitigate and remedy any violations. We are fully committed to this in our "Declaration of principles on human rights and environmental rights" (see [SUSTAINABLE ACTION](#)).

This document describes the rules of procedure for the complaints procedure pursuant to Section 8 of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) for Scheidt & Bachmann GmbH, as an obligated company. In principle, the procedure described herein also applies to reports and complaints directed against affiliated companies (pursuant to Sections 15 et seq. AktG (German Stock Corporation Act)) of Scheidt & Bachmann GmbH.

The most important information on our complaint procedure is presented below in the interests of maximum transparency, so that it is understandable and comprehensible for all parties involved.

Who can submit reports or complaints?

Regardless of where something has happened (at home or abroad), anyone can submit a report or complaint.

What types of reports and complaints can the complaints procedure be used for?

The complaints procedure enables individuals to draw attention to human rights and/or environmental risks, as well as violations of human rights or environmental obligations that have arisen in connection with the business activities of Scheidt & Bachmann GmbH or a company of the Scheidt & Bachmann Group in its own business area or in the supply chain.

How can reports or complaints be submitted (complaint channels)?

Reports and complaints can be submitted in different ways at any time. All reports and complaints are processed immediately and in the same way, regardless of how they are received.

- The Scheidt & Bachmann Group provides an **electronic whistleblower protection system** that can be used to submit complaints or reports via a web form. The electronic whistleblower protection system supports several languages and can be accessed via this link "[Whistleblower protection system](#)".
- Alternatively, reports can be submitted **by telephone** (in English or German) on +49 69 99 99 88 39 or **by e-mail** to whistleblower@scheidt-bachmann.com.
- For **personal notification** (in English or German), please make an appointment via whistleblower@scheidt-bachmann.com or by telephone on +49 69 99 99 88 39.

- Reports and complaints may also be submitted **by post** to the Compliance department:

Scheidt & Bachmann GmbH
Corporate Compliance
Meldestelle Hinweisgeberschutz
Breite Straße 132
41238 Mönchengladbach
Germany

If a report or complaint is to be submitted anonymously, we recommend using the whistleblower protection system.

What information should a report contain?

Reports should be based on facts and contain all relevant details that are known, such as dates, names of individuals and companies and countries involved. This is the only way to ensure a fair and accurate investigation. It is important to bear in mind that the information provided may have an impact on employees of the Scheidt & Bachmann Group and other parties involved. Information must be provided as accurately as possible and to the best of knowledge and observation. The whistleblower can choose whether to remain anonymous or to reveal their identity. When using our whistleblower protection system, contact is maintained during the investigation - even if the report was submitted anonymously.

Who is responsible for processing the report?

All reports or complaints are processed by selected and specially trained employees of the Corporate Compliance Department and the Human Rights Officer (hereinafter referred to as the "Complaints Office") and, if necessary, by employees of the Scheidt & Bachmann company concerned.

All persons involved in the proceedings are subject to confidentiality, are impartial and independent in the fulfilment of their duties and are not bound by instructions.

How is a report or complaint processed?

- Once a report has been received, its receipt is documented and, if possible, the whistleblower receives a confirmation of receipt within one week (7 days).
- The Complaints Office checks whether sufficient information is available to investigate the reported facts. If the information is insufficient, the whistleblower will be contacted to obtain further details. If this is not possible and there is still insufficient information, the case will be closed.
- If the available information is sufficient, the Complaints Office checks whether the reported issue constitutes a human rights or environmental risk or a violation of human rights or environmental obligations. In the course of this, an assessment is made as to which Scheidt & Bachmann company or which supplier is affected by the matter. If necessary, the responsible office, e.g. a technical expert within a Scheidt & Bachmann company, will be involved, while maintaining confidentiality and data protection.
- The Complaints Office will close the case if, after thorough examination and investigation, it is convincingly established that there are no human rights or environmental risks or violations neither in its own business area nor at suppliers.

- If there is a human rights or environmental risk or a violation of human rights or environmental obligations, the matter will be clarified as quickly as possible. Immediate corrective measures are taken, and their implementation is monitored. For other issues, a proposal for further action is drawn up based on the findings (especially preventive measures).
- The processing time varies greatly depending on the case and can range from a few days to several months. However, we endeavour to process and resolve the investigation as quickly as possible. The whistleblower will be informed of the conclusion of the complaint procedure if contact can be made.

How are whistleblowers protected from discrimination and reprisals?

Scheidt & Bachmann guarantees, within the framework of the law, effective protection of whistleblowers against discrimination and sanctioning based on a complaint or a report, insofar as this is possible.

The Scheidt & Bachmann Group Complaints Office will maintain the confidentiality of the identity of the whistleblower, the persons who are the subject of a report and other persons named in the report.

In accordance with the need-to-know principle, identities and information are only disclosed to those persons who are responsible for receiving and processing reports or complaints or for taking any follow-up measures. Confidentiality will continue to be maintained after the case has been closed. All data will be stored in accordance with applicable legal deadlines, e.g. under data protection law, and deleted after the deadline has expired.

Retaliation against whistleblowers who report an actual or suspected problem or grievance in good faith will not be tolerated. If the whistleblower feels that they have been subjected to intimidation or retaliation because of their report, they may contact the Complaints Office. Such incidents will be investigated in accordance with the procedure described above. In the case of whistleblowers who are employees of a direct supplier, we endeavour to conclude effective contractual arrangements with the supplier.