

# **Rules of procedure**

## **Complaints procedure**

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These rules of procedure describe the complaints procedure of Schüco International KG and meet the requirements in accordance with Section 8(2) of the German Supply Chain Due Diligence Act (LkSG).

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## 1 Area of application

Schüco International KG

## 2 Establishment and purpose of the complaints procedure

Schüco International KG (hereinafter referred to as “The Company”) has established an appropriate complaints procedure in accordance with Section 8 of the German Supply Chain Due Diligence Act (LkSG). The complaints procedure enables people to report risks to the environment and human rights as well as violations of obligations with regard to the environment and human rights arising from the commercial activity of The Company in its own area of business, including subsidiaries of The Company, or from the commercial activity of an indirect or direct supplier.

## 3 Responsibility and accessibility

The complaints procedure is handled by an external legal counsel (ombudsman) who has the following contact details:

**Dr Carsten Thiel von Herff, LL.M.**

Loebellstraße 4  
D - 33602 Bielefeld

Tel.: +49 521 557 333 0 / Mobile: 00800 – OMBUDSMANN

**E-mail:** [c.thielvonherff@thielvonherff.de](mailto:c.thielvonherff@thielvonherff.de)

**Reporting platform:** [www.report-tvh.com](http://www.report-tvh.com)

**Home page:** [www.thielvonherff.de](http://www.thielvonherff.de)

The legal counsel is an independent and autonomous lawyer. They are impartial and are not subject to instruction from The Company with regard to the handling of the case. The legal counsel is obligated to maintain secrecy. The identity of the whistleblower is kept confidential at all times.

There is also the option of submitting information internally via the Compliance Office. The Compliance Office has the following contact details:

Schüco International KG - Compliance Office  
Karolinenstraße 1-15  
D-33609 Bielefeld

+49 521 783 7300

[compliance@schueco.com](mailto:compliance@schueco.com)

The internal and external complaints procedure is free of charge for the whistleblower and is accessible in different languages.

## 4 Complaints procedure

The legal counsel or the Compliance Office receives the complaint and discusses the case with the whistleblower. In any event, the whistleblower receives confirmation of the information being received usually within 48 hours of submission but within 7 days at the latest.

The legal counsel checks whether a violation of obligation or a risk in accordance with the German Supply Chain Due Diligence Act (LkSG), or an infringement of other laws or internal regulations may have occurred. If sufficient evidence exists, the legal counsel submits the information shared with him – maintaining the duty of confidentiality – to The Company for investigation. The legal counsel themselves does not carry out an investigation so as not to compromise their neutrality.

The Schüco Compliance Manager and the Chief Compliance Officer investigate the case in accordance with the law and internal regulations and taking into account the concerns of all parties involved.

The Company ensures that the persons entrusted by The Company to carry out the complaints procedure act impartially and independently and are not bound by professional instructions. The Company also ensures that the persons entrusted to carry out the complaints procedure are competent in this area. The identity of the whistleblower is kept confidential at all times.

The investigation must be carried out quickly and without major interruptions.

Any persons affected by the investigation must be treated fairly and respectfully. The presumption of innocence applies to all those involved. The right to be heard must be afforded. Any persons affected by the case are therefore informed as soon as possible about the information supplied and their rights with regard to access and rectification. However, if notification poses a serious risk of compromising the investigation of the case, notification can be postponed until the conclusion of the investigation or until the risk no longer exists.

The Company carries out a legal assessment of the investigated matter and determines suitable and appropriate measures to remove and prevent incorrect business practices and can consult the legal counsel for this purpose. Measures may comprise appropriate civil action or the involvement of authorities, for example. Even if no infringements are established in this specific case, suggestions regarding changes to work and business processes or changes to organisational or conduct regulations may be made.

The whistleblower can access information about the state of affairs at any time from the legal counsel or the Compliance Office. Three months after submitting the notification, the person receives a response on the follow-up measures to the notification. Following conclusion of the procedure, the legal counsel or the Compliance Office will brief the whistleblower on the outcome and any measures implemented within the framework of what is legally permissible.

## **5 Protecting the whistleblower**

The whistleblower must be protected against discriminatory or disciplinary measures. Any retaliation against the whistleblower shall not be tolerated. In the event of indications of retaliation against whistleblowers, the legal counsel must be brought in without delay. In the event of retaliation, the Company itself shall carry out disciplinary measures and implement suitable and appropriate measures along the supply chain.

The legal counsel shall not disclose the name or identity of the whistleblower to The Company or third parties without their consent. Should the legal counsel be called as a witness in criminal, civil or other proceedings, they shall only disclose the name and identity of the whistleblower if this has been consented to in writing by them and The Company.

The desire of the whistleblower to protect their identity is in conflict with the interest of the persons affected by the disclosure of the subject matter. This is also why deliberate misuse of the ability to submit a complaint or information is not tolerated.

## **6 Data protection**

The processing of personal data collected as part of the complaints procedure is carried out in accordance with the EU General Data Protection Regulation (GDPR) and further national and European data protection laws. Adherence to the legal retention obligations and data protection regulations is ensured by the legal counsel and The Company.

The personal data collected is limited to information on the identity, job role and contact details of the whistleblower and the persons affected, as well as further personal data essential for the handling of the case. Personal data that is not relevant for processing a specific notification shall not be collected or shall be immediately deleted if collected unintentionally. Only reported facts, processing information, follow-up information to the notification and inspection reports will be saved.

Personal data collected within the framework of notifications and investigations shall be retained for two months following the conclusion of the investigations. This time period shall be extended accordingly if the investigation is followed by disciplinary or legal proceedings or other disputes for which the data must be used.

The data protection officer regularly checks that the complaints procedure conforms to data protection regulations. The documentation for fulfilling the due diligence obligations for the German Supply Chain Due Diligence Act (LkSG) shall be retained for seven years.

## **7 Effectiveness of the complaints procedure**

The effectiveness of the complaints procedure shall be reviewed by The Company once a year as well as on an ad hoc basis, for example if The Company anticipates a risk situation to change or increase significantly in its own area of business or that of an indirect supplier, for example due to the introduction of new products, projects or a new business area.