Rules of Procedure on the Complaints Procedure

These Rules of Procedure describe the Complaints Procedure of OTTO FUCHS KG and meet the requirements of Section 8 (2) of the LkSG

1. Scope

OTTO FUCHS KG and subsidiaries

2. Establishment and purpose of the Complaints Procedure

OTTO FUCHS KG (hereinafter referred to as the Company) has set up an appropriate Complaints Procedure in accordance with Section 8 of the LKSG. The Complaints Procedure enables individuals to point out human rights and environmental risks, as well as violations of human rights or environmental obligations, which have arisen as a result of the Company's economic activities in its own business area, including the Company's subsidiaries, or of a direct or indirect supplier.

3. Responsibility and accessibility

The Complaints Procedure is carried out by the external Lawyer of Trust (ombudsman), who can be contacted as follows:

Dr. Carsten Thiel von Herff, LL.M.
Loebellstraße 4
D - 33602 Bielefeld
T. +49 521 557 333 0 / M. 00800 – OMBUDSMANN

E-Mail: vertrauensanwalt@thielvonherff.de
Reporting platform: www.report-tvh.com
Homepage: www.thielvonherff.de

The Lawyer of Trust acts as a self-employed and independent lawyer. He is impartial and is not subject to any instructions from the Company regarding the substantive handling of the matter. The lawyer of trust is obliged to maintain confidentiality. The confidentiality of the identity of a whistleblower is always maintained.

It is also possible to submit internal reports via the Compliance Office. This can be achieved as follows:

OTTO FUCHS KG - Compliance Office
Derschlager Str. 26
58540 Meinerzhagen
T. +49 2354 73-1001
compliance@otto-fuchs.com

The Human Rights Officer is also available to receive reports of human rights or environmental risks or violations.

The contact details are as follows:

OTTO FUCHS KG - Human Rights Office
Derschlager Str. 26
58540 Meinerzhagen
T. +49 2354 73-1001
humanrights@otto-fuchs.com

The internal and external Complaints Procedure is free of charge for the whistleblower and accessible in various languages.

4. Complaints Procedure

The Lawyer of Trust or the Compliance Office receives the complaint and discusses the facts with the whistleblower. In any case, the whistleblower will usually receive an acknowledgement of receipt within 48 hours, but no later than 7 days after receipt of the complaint.

The Lawyer of Trust examines whether there may be a breach of duty or a risk within the meaning of the LkSG or a violation of other laws or internal rules. If there are sufficient indications to do so, he will pass on the facts submitted to him to the Company for investigation – in compliance with the confidentiality obligation. The Lawyer of Trust does not carry out an investigation himself, in order to not undermine his neutrality.

The Chief Compliance Officer investigates the report in compliance with the law and internal rules as well as taking into account the interests of all parties involved.

The Company warrants that the persons entrusted by the Company with the conduct of the Complaints Procedure act impartially, are independent and are not bound by professional instructions. Also, the Company ensures that the persons entrusted with conducting the Complaints Procedure are competent. The confidentiality of the identity of a whistleblower is always maintained.

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

People who are affected by an investigation must be treated fairly and respectfully. The presumption of innocence applies to all those affected. The right to be heard must be granted. For this reason, the persons affected by a report will be informed as soon as possible of the information received and informed of their rights of access and correction. However, if there is a serious risk that a notification will jeopardize the investigation of the report, notification may be postponed until after the investigation has been completed or until the risk has ceased to exist.

The legal assessment of the facts under investigation and the determination of appropriate and proportionate measures to eliminate and prevent incorrect business practices are carried out by the Company, which may also consult the Lawyer of Trust for this purpose. Measures may include, for example, appropriate civil action or the involvement of a public authority. Even if no violations are found in the specific case, suggestions for changes to

work and business processes as well as changes to organizational and conduct regulations may be appropriate.

The whistleblower can obtain information about the status of his complaint at any time from the Lawyer of Trust or the Compliance Office. He will receive feedback on the follow-up to the report three months after receipt of the complaint. Once the investigation process has been completed, the Lawyer of Trust or the Compliance Office will inform the whistleblower of the outcome and any measures taken to the extent permitted by law.

5. Protection of the whistleblower

Whistleblowers are protected from discriminatory or disciplinary measures. Any act of retaliation directed against them will not be tolerated. In the event of indications of retaliation against whistleblowers, the Lawyer of Trust must be consulted immediately. Retaliatory measures are subject to disciplinary actions by the Company and suitable and appropriate measures will be enforced along the supply chain to prevent any retaliation.

The Lawyer of Trust will not disclose the name and identity of the whistleblower to the Company or to any third party without their consent. If the Lawyer of Trust is heard as a witness in criminal, civil or other proceedings, he or she will only disclose the name and identity of the whistleblower if he or she is permitted to do so in writing by both the whistleblower and the Company.

The whistleblower's wish for the protection of his or her identity is countered by the interest of the persons affected by the complaint in the disclosure of the facts. This is another reason why a deliberate abuse of the opportunity to submit complaints and information will not be tolerated.

6. Privacy

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) as well as other national and European data protection laws. Compliance with statutory retention obligations and data protection regulations is ensured by the Lawyer of Trust and the Company.

The personal data collected is limited to information on the identity, function and contact information of the whistleblowers and data subjects, as well as to the other personal data that is absolutely necessary to process the facts. Personal data that is obviously not relevant for the processing of a specific complaint will not be collected or will be deleted immediately if it was collected unintentionally. In addition, only reported facts, processing information, follow-up of the report and test reports are stored.

For the personal data collected in the context of reports and investigations, the retention period is two months after the conclusion of the investigations. This deadline will be extended accordingly if the conclusion of the investigation is followed by disciplinary or judicial proceedings and other disputes for which the data must be used.

The Data Protection Officer regularly checks the compliance of the Complaints Procedure with data protection. The documentation for the fulfilment of the due diligence obligations of the LkSG is kept for seven years.

7. Effectiveness of the Complaints Procedure

The effectiveness of the Complaints Procedure is reviewed by the Company once a year and on a case-by-case basis, for example if the Company expects a significantly changed or significantly expanded risk situation in its own business area or at its direct supplier, for example due to the introduction of new products, projects or a new business area.

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