

RULES OF PROCEDURE

RULES OF PROCEDURE FOR THE COMPLAINTS PROCEDURE PURSUANT TO SECTION 8 OF THE ACT ON CORPORATE DUE DILIGENCE OBLIGATIONS IN SUPPLY CHAINS (LKSG)

The Rules of Procedure explain the main features of the complaints procedure, how persons or groups of persons can gain access to the procedure and how the procedure works after a complaint or an indication has been submitted.

What is the purpose of the complaints procedure?

The complaints procedure enables persons or groups of persons to point out human rights and environmental risks arising from the economic activities of the VHV Group in its own business area or from direct or indirect suppliers within its supply chain (early warning system). Persons or groups of persons are also given the opportunity to report suspected violations so that potential damage can be prevented by taking appropriate measures or at least minimised as far as possible (access to appropriate remedial action).

Who can submit complaints or indications?

Any person or group of persons may submit a complaint or indication, regardless of their connection to the VHV Group or its direct or indirect suppliers or the country in which the potential incident occurred.

What types of complaints or indications can be submitted?

The complaints procedure makes it possible to draw attention to human rights and environmental risks as well as violations of human rights or environmental obligations that are related to the following protected legal positions in accordance with Section 2 of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG):

- Prohibition of child labour
- Prohibition of forced labour and all forms of slavery
- Prohibition of discrimination
- Appropriate remuneration for work performed
- Protection of labour rights and occupational safety
- Protection of the right to form a coalition or association and the right to collective bargaining
- Lawful use of private and public security forces
- Protection of land rights
- Protection of environmental rights

How can complaints or indications be submitted?

Complaints and indications can be submitted at any time. All complaints and indications are processed immediately and in the same way. The VHV Group provides an electronic whistleblowing system in which complaints or indications can be entered into a web form.

Access to the whistleblower system is available at:

www.bkms-system.com/vhv-gruppe



Who processes the complaints and indications?

Complaints or indications are processed by selected employees of the VHV Group. All employees who are responsible for processing complaints have the necessary qualifications to do so. They are:

- Impartial
- Independent
- Not bound by instructions
- Obligated to maintain confidentiality
- Free from conflicts of interest
- Trained with regard to the potential content of reports and the processing of complaints in accordance with LkSG
- Equipped with sufficient time resources

How does the complaints procedure work?

The VHV Group will be in contact with the whistleblower throughout the entire procedure, if this is desired and a contact option exists. If required, it is possible for the whistleblower to set up a mailbox within the whistleblowing system.

After a complaint or indication has been submitted, the person submitting the report will receive a confirmation of receipt within one week.

Complaints or indications are first examined to determine whether the reported issue represents a human rights or environmental risk or a violation of human or environmental rights. The part of the VHV Group's business area or its direct or indirect suppliers within its supply chain affected by the indication is also examined. The complaint or indication is then passed on to the responsible body.

The facts of the case are then clarified. The responsible contact person discusses the facts of the case with the whistleblower with the aim of gaining a better understanding of these facts. The expectations of the whistleblower with regard to possible preventive or remedial measures are also discussed. This can be used later to work out a possible solution to the complaint. The clarification is generally carried out within three months. If, in the course of the clarification, it is determined that a violation of human or environmental rights is imminent or is already taking place, appropriate remedial measures are initiated immediately. The employees involved in the complaints procedure check whether, and to what extent, the remedial measures have been implemented and are effective.

How are whistleblowers protected?

Protecting whistleblowers from sanctions as a result of indications submitted is an important part of the complaints procedure.

The following measures serve to protect whistleblowers:

- All notifications are only processed by a small group of selected and specially trained employees.
- All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, will be treated confidentially. This also applies after the procedure has been completed.
- Internal communication is anonymised or pseudonymised if this is necessary to protect the person providing the information or if the person providing the information requests this.
- If possible and desired, contact is maintained with the whistleblower throughout the entire process so that the VHV Group can react to potential indications of disadvantages.
- In accordance with legal requirements, internal company documentation is stored for seven years and then destroyed.
- The sanctioning of whistleblowers is not compatible with the values of the VHV Group and will not be accepted or tolerated. Should they nevertheless occur in the VHV Group's own business area, they may be punished with consequences under labour law.