

# **Lohmann & Rauscher Group**

## **Rules of Procedure for the Complaints Procedure**

### **I. Introduction**

We are committed to compliance with the applicable laws as well as with internal company regulations and requirements. In particular, we are committed to respecting human rights and protecting the environment. The stated goal of the Company's Executive Board is to respect, protect and promote human rights and the environment throughout the entire supply chain. Violations of relevant laws, internationally recognised human rights or national and international environmental protection regulations will not be tolerated. L&R takes appropriate and effective measures to identify and verify risks in terms of human rights and the environment in its own business area and throughout the entire supply chain and to prevent, halt or at least minimise the realisation of risks. As one of several measures, an effective complaints procedure has been put in place for the purpose of identifying abuses, risks and breaches that can be used by employees and external parties in order to submit information, reports or complaints concerning (potential) breaches or risks.

These Rules of Procedure explain the process for submitting and processing reports. They set out how the complaints procedure may be accessed, who is responsible within the complaints procedure, how any complaints or reports received are dealt with, and what measures are taken to protect whistleblowers. The aim of the complaints procedure is to enable whistleblowers to contact us easily and securely in order to identify at an early stage any breaches of internal company regulations and requirements or of applicable laws, including in particular any breaches or risks involving risks in terms of human rights and the environment throughout the supply chain and to end or at least minimise any breaches that have occurred.

### **II. Addressees and scope of application of the complaints procedure**

The complaints procedure is publicly accessible and available to all persons, irrespective of their place of work or residence. The aim of the complaints procedure is to give any person the opportunity to report breaches of applicable laws and internal company regulations and requirements as well as breaches of obligations in terms of human rights and the environment in addition to risks arising on account of the economic actions of L&R or within the supply chain of L&R.

### **III. Procedure**

Regardless of the reporting channel through which information, a report or a complaint is submitted, the procedure shall be uniform after the receipt of the notification.

#### **1. Responsibility for the complaints procedure**

Responsibility for receiving and processing, information, reports or complaints lies exclusively with employees who are able to guarantee impartiality, are bound to secrecy and are not subject to any instructions with regard to the receipt and processing of reports, information and complaints.

## 2. Submission of a report

In principle, whistleblowers can use various channels to submit a report or a complaint:

- an internet-based reporting portal, which can be accessed via the following link: <https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/supplier-os-hub/public-access-app/complaint.html#/public/hub/landr/LRD/complaint/new>
- personal contact with the Human Rights Officer and Corporate Compliance Officer, Dr Wolfgang Stahl or the local compliance officer [<https://www.lohmann-rauscher.com/en/company/tell-us/our-whistleblowing-system/>]
- a telephone conversation with the Human Rights Officer and Corporate Compliance Officer, Dr Wolfgang Stahl (Tel: + 49 2634 996648) or the local compliance officer
- sending a letter to the Human Rights Officer and Corporate Compliance Officer, Dr Wolfgang Stahl (Westerwaldstraße 4, 56579 Rengsdorf, Germany) or the local compliance officer

Reports can be submitted either indicating the name of the whistleblower or anonymously.

The processing status of a report submitted via the internet-based portal can be tracked within the online reporting portal.

## 3. Receipt of a report

After receipt of a report, the whistleblower receives a confirmation of receipt. Confirmation of receipt is usually sent immediately after the report is received, or at the latest within 7 days of receipt of the report.

## 4. Processing of the report

After receipt of the report, it is dealt with centrally by the responsible case handler. If the report is submitted via a central reporting channel or a central complaints channel, and cannot be allocated automatically to the respective responsible case handler, the report is subject to an initial review. The report is allocated to the responsible case handler after the initial review.

The responsible case handler assesses the facts of the case in detail and, if necessary, discusses them with the whistleblower. If necessary, the respective responsible case handler asks the whistleblower to provide further information.

The whistle-blower receives feedback concerning the state of the procedure at the latest three months after submission of the report, unless national legislation provides for more stringent rules in the specific individual case. In such cases, the more stringent national legislation applies.

## 5. Anonymous submission of a report

If a report is submitted anonymously, no data will be recorded that would enable the identification of the whistleblower. If the whistleblower provides information that would allow conclusions on his or her identity, the information will be treated confidentially.

## 6. Confidential submission of a report

Whenever a report is submitted, the confidentiality of personal data and other information that would allow conclusions on the identity of the whistleblower is guaranteed. Only the responsible

case handler and the person responsible for initial review of the complaints have access to the report.

## **7. Documentation of reports**

Reports are retained in accordance with the relevant applicable legal requirements.