



Supply Chain Due Diligence Act [LkSG]

Complaints Procedure Rules

Complaints and Reporting Procedure

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1 Foreword

We operate successfully on the basis of a powerful, honest and inspiring corporate culture. We stand by our responsibility for employees, society and the environment and motivate others to follow our example. We comply with the relevant national and international laws and regulations and ensure that all activities within our sphere of influence have no negative impact on human rights. In doing so, we recognise that ensian group GmbH has a responsibility for its value chain to uphold internationally recognised human rights standards and to support their fulfilment.

From 1 January 2024, the ensian group and its subsidiaries are obliged to implement the provisions of the German Act on Corporate Due Diligence in Supply Chains [Lieferkettensorgfaltspflichtengesetz or "LkSG"]. With these rules of procedure, ensian group provides information on the complaints procedure in accordance with Section 8 LkSG.

The complaints procedure enables potentially affected persons to point out human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of business activities within and outside the ensian group. The ensian group ensures the accessibility of the complaints procedure by paying particular attention to ensuring that it is known and that there are no reasons that prevent those affected from using it.

2 Complaints and reporting procedure

2.1 Aim and purpose of the complaints procedure

The complaints procedure enables the reporting of information about risks or violations of human rights or environmental obligations that have already occurred in the ensian group's value chain to the ensian group in a confidential manner. It is a protected channel for communicating observations, information and concerns in this regard. Completely anonymous complaints are also possible via this procedure.

Every report submitted in good faith helps the ensian group to recognise risks in its supply chain at an early stage and to prevent them from occurring or to permanently remedy violations that have already occurred. We expressly request the assistance of all those employed by the ensian group or who come into contact with the ensian group externally to report such observations to us.

2.2 Who can submit complaints and reports?

The complaints procedure is available to all employees and business partners as well as their employees and all other persons who are directly or indirectly associated with the ensian group.

2.3 What kind of notifications can the procedure be used for?

Indications of an actual or potential violation of laws, internationally recognised standards in the area of human rights and environmental obligations, as well as internal company regulations, can be reported. This applies regardless of whether the risks or violations are within the business area of ensian group, its business partners or their upstream or downstream business partners.

Reports can be submitted in the following categories:

- Violation of competition and antitrust law
- Corruption and bribery
- Conflict of interest
- Violation of compliance with product regulations
- Financial irregularities
- Violation of data protection laws
- Violation of export control and sanctions regulations
- Violations or concerns in the area of environment, health and safety (EHS)
- Violation of human rights
- Harassment and discrimination
- Other material violations of policies or laws

2.4 How are whistle-blowers protected?

Confidentiality, protection of the whistle-blower and fairness are our basic principles for dealing with incoming reports. Information about the incident and the persons involved will only be passed on if this is necessary for further investigation of the report and only to those whose co-operation is essential for clarification.

If the complaint has not been submitted anonymously, personal information may also be passed on. Data protection regulations are complied with at all times. However, reporting persons are free to refrain from providing information about their identity and thus submit a report that remains anonymous in all cases.

The ensian group protects whistle-blowers from discrimination and reprisals to the best of its ability. Any unfavourable treatment of whistle-blowers will be treated as serious misconduct and punished accordingly. Persons who are involved in such repressive action against whistle-blowers must in any case expect measures under labour law.

2.5 How can notifications be submitted?

The ensian group pursues a 'speak-up' culture. In addition to direct and personal reporting to superiors, the Compliance & Integrity or Human Relations departments or the Management Board, there is also the option of reporting information via the web-based Group-wide whistle-blower system.

The report should include full details of the concern, including relevant dates, locations, persons, companies involved and witnesses. Please only submit complaints or reports if you are convinced that they are correct.

The whistle-blowing system is operated by an external service provider and offers both a telephone hotline and a web solution for whistle-blowing. The system allows both telephone and web-based, open reporting with names, but also anonymous reporting. The digital whistle-blowing system is available in German and English.

Information submitted by telephone is recorded by trained personnel from the external service provider, who record the facts and forward them confidentially to the ensian group's Compliance department in the next step.

The reporting and complaints system can be reached as follows:

Telephone number: +49 800 3800 999 (Monday to Friday, from 9:00 a.m. to 5:00 p.m.; no domestic charges apply)

Link: [Compliance & Integrity - elobau](#)



2.6 Who deals with complaints or reports submitted?

Any information provided will be recorded by the ensian group's reporting centre. The reporting office is located in the Compliance & Integrity department of the ensian group's management. This is supported by trained employees from the Human Relations, Information Security and Data Protection departments, who record incoming information and act as case managers to initiate a corresponding clarification of the facts. All case managers have access to the whistle-blower system and together form the reporting centre.

The employees of the reporting centre will process the matter objectively, impartially and without instructions and are obliged to maintain confidentiality.

2.7 What happens to notifications submitted?

The complaints procedure is organised as follows:

- Receipt of the notification:

Once a notification has been received, it is recorded by the Reporting Office.

If information is submitted via the whistle-blowing system, the person submitting the notification will receive a confirmation of receipt via the system's chat function within seven days. If information is provided via internal contact points, communication takes place via the reporting centre or the manager.

Even in the case of an anonymous information via the whistle-blower system, it is possible to submit and receive additional circumstances and information by telephone or by accessing the whistle-blower system in the web browser using a special access code. If necessary, the Reporting Centre will ask questions about the information via the reporting channel chosen by the person making the report. These can also be retrieved by the whistle-blower using the special access code.

- Check of the reference:

If a notification is received, the responsible case manager first carries out a preliminary assessment to determine whether the notification falls within the scope of the complaints procedure.

If it is confirmed that there is a relevant tip-off, the compliance incident is immediately recorded in the whistle-blower system. If the relevance cannot be determined, the measures required in the individual case are initiated in order to obtain further information for clarification.

If, even after intensive examination, it becomes apparent that the tip-off does not fall within the scope of the complaints procedure, this is briefly explained to the person making the tip-off and the process is closed.

- Clarification of the facts:

If a tip-off falls within the scope of the complaints procedure, an internal investigation will be initiated to clarify the facts and assess the seriousness of the allegation.

In principle, the following applies to the clarification of the facts:

- The examination is carried out immediately and thoroughly in order to gather all relevant information.
- The results of the investigation are documented.
- The examination is carried out independently and without conflict of interest by trained personnel.

The underlying causes of misconduct, weaknesses in the compliance management system or process weaknesses and errors of responsibility, including those of managers, are also recorded in the course of the investigation and the causes analysed.

The whistle-blower will be informed of the outcome of the investigation.

- Development of a solution:

The case manager assesses the incident and makes a recommendation on follow-up measures and the next steps.

The Reporting Office will draw up a proposal to remedy the situation. As far as possible, the person providing the information will be involved in finding a solution.

- Implementation of remedial measures:

If a violation is detected, appropriate measures are taken to rectify the incident and prevent future violations as far as possible.

The implementation of corrective measures also includes avoiding future violations and ensuring that the knowledge gained is taken into account as part of risk analysis and prevention.

- Conclusion:

The whistle-blower will receive feedback on the status of the procedure within three months of confirmation of receipt of the notification (e.g. via the chat function of the whistle-blowing system). If the investigation takes more than three months, the whistle-blower will receive feedback at regular intervals, at the latest every three months.

2.8 Review of the effectiveness of the complaints procedure

The ensian group reviews the effectiveness of the complaints procedure at least once a year and when there is a specific reason to do so.