

## Procedure for the Digital Whistleblower System

(as of April 2023)

These following procedure regulates the whistleblower system and the complaint reporting system

- according to the **Supply Chain Sourcing Obligations Act**,
- according to Directive (EU) 2019/1937 ("**Whistleblower**") (*in future Whistleblower Protection Act*) as well as
- in accordance with the Group's **Code of Conduct**.

In relation to all these provisions, the term "**whistleblower system**" is used uniformly below.

Notices and complaints are hereinafter collectively referred to as "**reports**".

### 1. Which reports are processed?

This whistleblower system serves to receive and process reports of potential breaches of rules or grievances in relation to the regulations mentioned above. It does not process product- and service-related customer concerns and complaints.

### 2. Who is responsible for processing the reports?

**The Compliance Officer** (Head of the Compliance group function; also referred to as the Compliance Officer) of Pfeifer & Langen Industrie- und Handels-KG is responsible. He/she receives and processes the reports.

The Compliance Officer can be contacted via the Digital Whistleblower System ([Whistleblower System](#)) or by post at Pfeifer & Langen Industrie- und Handels-KG, attn: Compliance Officer, Aachener Straße 1042a, 50858 Cologne.

### 3. Who can submit reports?

All employees, business partners and third parties can submit reports.

#### 4. How can reports be submitted?

You can contact the Compliance Officer digitally or by post (see No. 2 above).

You can submit reports **anonymously or under your name**.

You can submit reports in German, English or numerous other languages.

#### 5. How are reports processed?

- You will receive a written confirmation of receipt. If you have submitted the report in the digital whistleblower system, you will receive the confirmation of receipt in the digital portal.
- The Compliance Officer and his/her department will then immediately check your report. The first step is to check whether the report is plausible and whether there has been or may be a violation of the regulations mentioned at the beginning of this procedure
- If the report requires it, the Compliance Officer will contact you and ask follow-up questions to discuss the facts with you. If you have submitted a report anonymously, you must log in to the portal regularly.
- The Compliance Officer shall take further internal and external measures to investigate the report and remedy any breach of the rules. To this end, the Compliance Officer may involve or inform other internal or external persons and bodies as he/she deems necessary.
- In any case, the information will be treated with the **utmost confidentiality**.
- The Compliance Officer investigates your report in compliance with the law and internal rules, taking into account the interests of all parties involved. Reports have a high priority and the investigation should be carried out quickly and without major interruptions. Depending on the scope and degree of complexity, a proper examination of reports can take a few days, but also several months. Respectful and fair treatment of all persons concerned is an important principle. The presumption of innocence applies to all persons concerned. The right to be heard is guaranteed. Therefore, the persons affected by a report are informed as soon as possible about the report received and advised of their rights to information and rectification. However, if there is a serious risk that such a notification would jeopardize the investigation of the report, a notification may be postponed.
- You will receive notification of the processing status in due course. However, you can also contact the Compliance Officer yourself at any time to find out the status of the matter.
- Upon completion of the procedure, the Compliance Officer shall prepare a final report.

- All reports are processed impartially. The Compliance Officer and his/her department are not subject to any instructions from our company regarding the content.

## **6. How is data protection ensured?**

The Compliance Officer shall ensure compliance with data protection law with regard to the report. Personal data collected is limited to information on the identity, function and contact information of the reporting and affected persons, as well as other personal data that is absolutely necessary for processing the matter. In addition, only reported facts, processing details, follow-up questions and inspection reports are stored. The retention period for personal data recorded in the course of notifications and investigations is two months after completion of the investigations. This period is extended accordingly if the conclusion of the investigation is followed by disciplinary or legal proceedings or other disputes for which the data must be used.

## **7. What is the language of the proceedings?**

The language of the procedure is German and English. You can also submit reports in other languages (see No. 4 above).

## **8. Are there any costs for the complaint?**

You will of course not incur any costs if a report submitted in good faith is received.

However, the Company will not pay any costs or expenses you may incur in connection with the use of the complaints procedure, including but not limited to travel expenses and legal advice.