

Rules for the Complaints Procedure under § 8 Para. 2 of the Supply Chain Due Diligence Act

Introduction

Responsibility and environmental awareness have always been among the values and guiding principles of our Mission Statement. Our business activities must therefore always include respect for human rights and the environment.

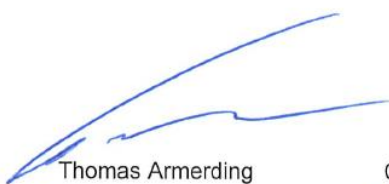
An appropriate complaints procedure is a central element of our due diligence obligations when it comes to the effective prevention and remediation of human rights and environmental risks or violations.

We take the concerns of employees in our supply chain and other affected persons seriously. With this complaints procedure, we wish to encourage everyone involved to engage in open and constructive dialogue.

This complaints procedure describes the available communication channel and defines the process for handling information about human rights and environmental violations. Such information helps to ensure that risks and violations can be identified and dealt with at an early stage. Active risk management can prevent harm to people and the environment. This is important for a trusting cooperation within the supply chain.

We assure all persons who provide information on human rights and environmental risks or violations that we will protect them from personal consequences in the best possible way. If a person providing such information is discriminated against or subjected to pressure, we will not tolerate such behaviour.

Bremen, 01.01.2025



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1. Reasons and purpose

On 1 January 2023 the law on corporate due diligence obligations to prevent human rights violations in supply chains (Supply Chain Due Diligence Act) came into force.

The aim of the Supply Chain Due Diligence Act is to ensure that companies identify human rights and environmental risks within their own organisation and along their supply chains and, where possible, either prevent them or at least mitigate their impact. For this purpose, the law requires the companies concerned to implement a range of due diligence measures, including the operation of an appropriate complaints procedure.

2. What is the function of the complaints procedure?

The complaints procedure is designed to fulfil two functions.

- On the one hand, the complaints procedure serves as an early warning system that identifies problems and, in the best case, solves them before people or the environment are actually harmed.
- On the other hand, complaints procedures offer access to appropriate remedies. This means that companies can be made aware of impending or actual violations of rights, and can then take effective remedial action.

3. To which companies do these procedural rules apply?

These procedural rules apply to the following company/companies:

- HANSA-FLEX AG

4. Who can submit reports?

Any person or group of persons who are potentially or actually affected by human rights or environmental violations in their own area of operations or within the HANSA-FLEX supply chain, or who are aware of such violations, can provide information via the complaints procedure.

These include, for example:

- employees of HANSA-FLEX and its subsidiaries
- employees of direct and indirect suppliers and business associates,
- customers,

- relatives of employees,
- trade unions, non-governmental organisations and other organisations that become aware of risks or damage and/or support those affected.

5. What can be reported?

Information or complaints can be submitted if there is a potential risk to human rights or the environment.

A human rights risk is a situation or behaviour in which the following human rights are violated:

- child labour,
- forced labour,
- forms of slavery,
- failure to comply with occupational health and safety standards,
- failure to respect freedom of association,
- discrimination against or unequal treatment of employees,
- failure to provide appropriate remuneration for work performed,
- human rights violations through environmental damage, failure to comply with land rights,
- violence by private or public security forces.

In addition, information or complaints can be submitted regarding human rights risks in connection with potential environmental damage, which often goes hand in hand with human rights violations. This concerns:

- harmful soil contamination,
- water pollution,
- air pollution,
- noise pollution,
- excessive water consumption,

and in particular when they negatively affect the natural foundations of life, e.g. because they prevent access to food, drinking water or sanitary facilities, or impair people's health in general (e.g. when chemicals enter rivers and contaminate the drinking water for local residents).

In addition, attention can also be drawn to environmentally related risks in the following cases:

- The prohibited use of mercury in manufacturing processes (as defined by the Minamata Convention on restricting mercury emissions),

- Violations of the prohibition or restriction of the production and use of persistent organic substances (as defined by the Stockholm Convention on Persistent Organic Pollutants),
- Violation of the requirement to minimise transboundary transport of hazardous waste and to ensure environmentally sound disposal close to its place of origin (as defined by the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal).

6. How can reports be submitted?

As a channel for complaints, HANSA-FLEX provides an electronic whistleblower system called “CrefoSupply”. This has a secure mailbox for complete and anonymous communication.

Complaints and information about the issues listed under Point 5) can be submitted via this system.

The whistleblower system can be accessed via the following link:

<https://hansa-flex.crefosupply.de/>



7. What information should a complaint contain?

In order for a report to be properly processed and investigated, it is important for it to be as specific as possible. It is helpful if the following five questions are covered by the report:

Who? What? When? How? Where?

WHO: Which (subsidiary) company, business associate or supplier is the complaint about?

WHAT: What has happened? Please describe the incident in as much detail as possible.

WHEN: When did the incident occur?

HOW: How did you find out about it? How did the incident develop?

WHERE: Where did the incident take place? Which of the company's business areas is involved in the unlawful conduct? For example, the production facility, a specific department etc.

8. Overview of the complaints procedure

Complaints can be submitted via the digital whistleblower system CrefoSupply. The person providing the information will receive an acknowledgement within seven days. If the whistleblower wishes this, the dialogue can be completely anonymous. Information regarding identity is provided voluntarily. Special encryption technology is used to protect all information from being accessed by unauthorised third parties.

To begin with, an initial assessment is carried out to check whether the reported violation falls within the factual scope of the complaints procedure, whether the described incident can be regarded as credible and basically possible, and whether it could pose a risk to human rights and/or the environment, a violation of human rights and/or environmental obligations, or a serious violation of an internal company policy. The purpose of this initial assessment is to determine whether a suspicious situation exists that makes it appropriate and necessary to take further investigative or fact-finding measures, as well as possible preventive and remedial action. It is carried out by the Compliance Office of Creditreform Compliance Services GmbH (referred to below as "CCS").



Following a plausibility check by the CCS Compliance Office, the HANSA-FLEX complaints unit clarifies the facts of the issue on a case-by-case basis, and attempts to gather all the relevant information. Reports of violations by direct or indirect suppliers will be investigated together with those suppliers. If necessary, the HANSA-FLEX complaints unit will contact the person providing the information – provided that they, in turn, make contact possible – in order to gain a better understanding of the facts of the case. Depending on the complexity of the case, it will also estimate the time needed for processing. The whistleblower will receive feedback within three months on the action taken in response to the report and the current status of the report.

9. Outcome of the complaints procedure

If, in the course of clarifying the facts, it is established that a violation of human rights or the environment is impending or already taking place, appropriate remedial action will be taken without delay. In addition, preventive measures will be taken to avoid further violations of the same kind or to minimise the risk of them occurring. The complaints unit monitors whether the remedial measures have been implemented and have effectively led to the elimination or minimisation of the risks, as well as the implementation of preventive measures.

If the case will not be processed for factual reasons (e.g. because the facts are already known and have already been clarified or have proved not to be credible) the person providing the information will also be notified of this, together with an explanation.

When the processing has been completed, i.e. when the matter has been dealt with in such a way that the essential information has been collected and evaluated, the whistleblower will receive as much feedback about the outcome of the matter as is legally permissible.

10. Responsibilities and contact persons

Complaints are processed by HANSA-FLEX employees, with the support of other specialists as required. Christian Herm (Head of Organisation) is responsible for the processing of complaints.

HANSA-FLEX employees are impartial, independent, free to take their own decisions and bound to secrecy.

11. Protection of whistleblowers

Throughout the entire procedure, individual measures are designed and implemented on a case-by-case basis to ensure that whistleblowers are protected from discrimination or punishment as a result of the information they provide.

Generally speaking, the following measures are in place to protect whistleblowers:

- Their information is treated in strict confidence during and after the conclusion of the processing. Names, personal data or other information that could be used to identify the whistleblower will not be passed on without good reason. Where necessary for the protection or at the request of the whistleblower, communication, in particular with suppliers, will be anonymised or pseudonymised.
- If possible and requested, HANSA-FLEX employees will maintain contact with the whistleblower throughout the entire process and can take action if there are any indications of discrimination.
- Any unjustified discriminatory action or punishment of whistleblowers as a result of or in connection with a complaint or information provided by them will not be tolerated by HANSA-FLEX, and may result in disciplinary action under labour law if it occurs in the company's own area of operations.

12. Documentation and publication

As part of its reporting obligations under the Supply Chain Due Diligence Act, HANSA-FLEX regularly publishes information on the number of reports received, the subject matter of these reports and the conclusions drawn from them. Publication is always in anonymised form without mentioning names.

Version/change history

Any changes made to this document must be documented here. Please note where the changes have been incorporated.

Version	Date	Processed by	Sections changed
V1	01.01.2024	Sarah Schmidt (CCS)	First version
V2	02.01.2025	Nikola Adams (CCS)	6, 7 (new), 8, 9, 10, 12 (new)

Authorisation

Name	Position	Status	Date