

Rules of procedure for the complaints procedure pursuant to Section 8 of the Supply Chain Due Diligence Act (LkSG)

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1. Purpose

Respect for human rights and the environment is an important part of our corporate culture, both in our company and in our supply and value chain. Techem is therefore committed to respecting internationally recognised human rights and preventing human rights violations. Techem and its companies implement all requirements of the law on corporate due diligence to prevent human rights violations in supply chains (Supply Chain Due Diligence Act (LkSG)) in order to fulfil and monitor the implementation of human rights and environmental due diligence obligations. An important core element of these due diligence obligations is the establishment of an effective complaints procedure through which human rights and environmental risks or violations can be reported.

The complaints procedure enables us to recognise human rights and environmental risks along our supply chain at an early stage and avoid violations.

These rules of procedure provide information on the main features of the complaints procedure, access to and availability of the procedure and responsibilities. It also provides information on what happens to incoming reports and complaints, i.e. how the complaints procedure works.

2. Area of application

Techem's complaints procedure is aimed at all persons or groups of persons who are potentially affected by human rights or environmental violations in our own business area or within Techem's supply chain or who are aware of such violations and wish to inform us of them or complain about them (hereinafter uniformly referred to as "whistleblower(s)").

3. Complaints channels

Complaints and information can be submitted to Techem in various ways. All complaints and information are processed immediately and according to the same basic principles, regardless of how they are received by us.

The following options are available:

- Anonymously via our electronic reporting system: <https://techem.whispli.com/lp/telltechem?locale=de>
- By e-mail: compliance@techem.de
- Contact the Group Compliance Officer by telephone (+49 6196 5220) via the reception desk
- In person by prior appointment at our head office in Eschborn
- By post by letter to:

Techem GmbH
z. For the attention of the Group Compliance Officer
Main street 89
65760 Eschborn
Germany

4. Confidentiality and protection of whistleblowers

Reports and complaints can be submitted by name or anonymously. All reports addressed to us will be treated confidentially. Of course, it is also possible to submit a report anonymously at first and to reveal your identity in the course of the procedure.

Techem prohibits any form of retaliation against whistleblowers who submit a complaint in good faith and uses appropriate methods to protect against retaliation. It does not matter whether the complaint proves to be justified or unfounded.

If a person or organisation feels that they have been retaliated against as a result of a complaint, they should inform Techem immediately. Techem will investigate the retaliation separately and, if necessary, take appropriate measures to eliminate the retaliation.

5. Procedure of the complaints procedure

Confirmation of receipt

Every report submitted via our electronic reporting system is automatically assigned to a responsible case handler within 72 hours. Whistleblowers should receive a prompt notification that their report has been received.

Case-by-case examination and clarification of the facts

In principle, all investigations are conducted objectively and in compliance with the presumption of innocence.

As part of an individual case review, the case handler first checks whether there is a sufficiently concrete initial suspicion of a breach of applicable legal provisions (such as the LkSG) or our company guidelines.

If the information in the report is not sufficiently specific, the whistleblower will be given a reasonable period of time to respond to queries in order to substantiate and verify the facts, if necessary, in order to substantiate a possible initial suspicion.

Possible steps

If a report cannot be sufficiently substantiated even after the expiry of a reasonable period of time and other possibilities for substantiation have also been exhausted, the investigation is closed due to the lack of a sufficiently concrete initial suspicion.

If a report is not processed further due to a lack of sufficient initial suspicion or another objective reason (e.g. facts already known, measures already taken), the whistleblower will be informed of this together with a reason.

If the facts of the case are sufficiently specific and there is an initial suspicion, the case handler will initiate an investigation and endeavour to obtain all essential information to clarify the facts of the case. The case handler will observe the principle of proportionality, according to which the investigative measures must be suitable, necessary and appropriate in order to fulfil the purpose of the investigation.

If it is established during the investigation that a legal violation (e.g. human rights or environmental violation) is imminent or has already occurred, suitable preventive or remedial measures are taken immediately. Remedial measures can be

developed in dialogue with the respective whistleblower. If appropriate, a procedure for amicable dispute resolution (mediation) can also be implemented. The whistleblower will be informed of the remedial measures by the case handler.

Whether the preventive and corrective measures have been implemented and the risks effectively eliminated or minimised is monitored and evaluated by the case handler together with another responsible specialist department if necessary.

6. Integration of third parties

If necessary, an independent third party will be commissioned to conduct an external investigation.

If employee representatives have participation rights during the complaints procedure and the associated investigation, they will be involved accordingly.

7. Duration of proceedings

Techem processes every report and determines the underlying facts as quickly as possible, taking into account the urgency resulting from the content of the report. Depending on the complexity of the case, the processing time can vary greatly in individual cases, but should generally not exceed three months after confirmation of receipt to the notifying party. If, in individual cases, additional measures to clarify the facts of the case lead to a longer processing time, the whistleblowers will be informed accordingly.

8. Data protection

Complaints are processed in accordance with the applicable data protection regulations. Only the personal or personal-related data required to process the complaints procedure is collected, processed, transmitted and stored. After completion of the procedure and existing retention periods, the personal data will be anonymised or deleted.

9. Verification of the effectiveness of the procedure

Techem reviews the effectiveness of the complaints procedure at least once a year and on an ad hoc basis. This includes, among other things, the actual use of the complaints procedure by whistleblowers, compliance with the rules of procedure, the monitoring of any remedial measures and other findings obtained from the complaints procedure and the risk analyses. The currently valid version of the BAFA handout on the complaints procedure is also taken into account.

10. Validity

These rules of procedure are valid from 01.01.2024 valid.

Eschborn,
Techem GmbH