

# KLETTGRUPPE

Rules of Procedure for the Complaints Procedure  
under the Act on Corporate Due Diligence  
Obligations in Supply Chains

# Table of Contents

01	Our supply chain guidelines	03
02	Scope of application of the complaints procedure	04
03	The complaints procedure	05
04	Protection of whistleblowers' identity	06

## Our supply chain guidelines

The Klett Group is aware of its social and ecological responsibility and has set out its guidelines in a policy statement. We wish to meet these requirements not only within our own group of companies, but also along our supply chain. We attach particular importance to complying with fundamental environmental and human rights standards.

In order to prevent violations of our supply chain standards, the companies of the Klett Group pursue appropriate strategies and follow processes and guidelines at their sites, which they develop on an ongoing basis.

## Scope of application of the complaints procedure

We take violations of our standards and principles along the supply chain very seriously. Please report to us any complaints or information relating to such violations immediately.

### 2.1. Who does the complaints procedure apply to?

The complaints procedure can be used by all internal and external persons. This includes but is not limited to employees of the Klett Group, employees at direct and indirect suppliers, and residents around local sites.

### 2.2. What types of complaints / information can be submitted?

We expect our complaints procedure to provide us with information about potential human rights or environmental risks or inadequate preventive and remedial measures as early as possible. Only in this way is it possible to implement appropriate remedial and preventive measures.

Section 3 of the [Act on Corporate Due Diligence Obligations in Supply Chains](#) defines the applicable due diligence obligations.

With regard to human rights, these include in particular the prohibition of child labor, protection against slavery and forced labor, freedom from discrimination, protection against the unlawful taking of land, occupational health and safety and related health hazards, the right to form trade unions or employee representation bodies, the prohibition on causing harmful soil or water pollution, and protection against torture.

Due diligence obligations also apply to certain environment-related risks: These risks include violations of human rights (e.g. poisoned water) and the prohibition of substances that are dangerous to humans and the environment.

### 2.3. Who can I turn to if I have a complaint / information?

You can use an e-mail box ([report.supplychain@klett-gruppe.de](mailto:report.supplychain@klett-gruppe.de)) we have set up specifically for this purpose to send reports confidentially to our contact person Melanie Huber.

Melanie Huber acts independently and is not subject to instructions. She handles all complaints and information disclosed to her with the utmost care and confidentiality.

## The complaints procedure

### 1. A complaint or information with documentation is received.

- Your message is sent to the responsible contact person who then documents its receipt.
- You receive acknowledgment of receipt within seven days.

### 2. Examination of the complaint or information

- The received message is examined.
- The internal processes set in motion will depend on the severity of the issue.
- You will receive feedback within one month if your complaint is not accepted.

### 3. Clarification of the facts

- The facts of the case will be examined in detail within three months and discussed with you as the whistleblower.

### 4. Development of a solution with the whistleblower

- Development of a proposal for remedial action in discussion with you as the whistleblower.

### 5. Remedial action

- Agreed remedial action is implemented promptly and followed up.

### 6. Review and conclusion

- The outcome is evaluated with the whistleblower after one calendar year.

### 7. Review of effectiveness

- The effectiveness of the process is reviewed annually and in ad hoc reviews.
- If necessary, the procedure or the remedial action taken is adjusted.

## Protection of whistleblowers' identity

We guarantee your protection. Your identity as the whistleblower will only be known to the contact person Melanie Huber. Information about you will only be disclosed if you have given your prior consent or if external authorities who may need to be involved have a legal right to receive such information.

All incoming reports are documented in compliance with the requirement for confidentiality. A report on the past fiscal year, that appropriately protects company and business secrets, must be submitted annually to the Federal Office of Economic Affairs and Export Control (BAFA). The report must be published on the company website no later than four months after the end of the fiscal year and must remain publicly accessible for at least seven years.