

VIACAMA

RULES OF PROCEDURE FOR A COMPLAINT PROCEDURE

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Rules of Procedure for a Complaint procedure through which internal and external persons can report to the respective company of the VIACAMA group about human rights or environmental risks or violations in the own business area and in the supply chain:

- VIACAMA provides a complaint procedure for all companies of the VIACAMA group, through which internal and external persons can report to the respective company of human rights or environmental risks or violations in the own business area and in the supply chain (in particular within the meaning of the German Supply Chain Due Diligence Act).
- In the case of anonymous whistleblowers, communication takes place via the electronic improvement and anonymous whistleblower system.
- In the case of non-anonymous whistleblowers, the communication channel will be agreed with the whistleblower.
- The handling of reports of human rights or environmental risks or violations in the own business area and in the supply chain is carried out within the framework of the "VIACAMA Improvement and Anonymous Whistleblowing System".

This ensures the principles for a complaint procedure - such as persons acting impartially and independently in the performance of their duties in the complaint procedure, persons bound to secrecy, confidentiality of the identity of whistleblowers.

- Reports received on human rights or environmental risks or violations in the own business area and in the supply chain are subject to a "preliminary examination" by the VIACAMA Case Review Committee. In the process, it is examined whether the available information is comprehensible, plausible and conclusive, and a decision is made as to whether the matter shall be further investigated or dealt with based on this information.
- Immediately after completion of the preliminary examination, the whistleblower receives a confirmation of receipt of his or her report as well as information on the further procedure.

- The whistleblower will receive information about the completion of the matter at the latest after the matter has been completed (the aimed period for this is a maximum of 3 months).
- The investigation or handling of received reports of human rights or environmental risks or violations in the own business area and in the supply chain is carried out under the direction of the VIACAMA Case Management and Investigation Office. The Chief Compliance Officer of the VIACAMA group may assign certain cases to himself (e.g. in case of cross-company impact).

Other functions may be involved in this process. In any case, a representative of the company concerned shall be involved.

- In all cases dealt with under the complaint procedure, an investigation is conducted to clarify the facts of the case. If misconduct or a risk is identified, preventive or corrective measures are defined and their implementation is followed up.