

Rules of Procedure – Complaint Procedure

Preamble

Compliance with obligations related to human rights and the environment, as well as acting in accordance with the law is of crucial importance for the companies of the Feddersen Group. We not only pursue the consistent observance of these principles in our own business area, but also demand this from our global business partners. We see it as our social responsibility to work towards ensuring that human rights are respected in our companies and along our supply chains. We are therefore committed to uncovering corresponding grievances, eliminating risks and remedying violations of duty.

The complaint procedure plays a central role in the timely identification of possible violations of duty and the initiation of appropriate preventive and remedial measures. It enables all persons to submit reports or complaints at any time.

We ask you to inform us immediately of any risks or violations of duty. We will take care of your reports and complaints with the greatest possible attention and care.

These rules of procedure transparently present the implementation of the Feddersen Group's complaint procedure in terms of the legal requirements pursuant to the German Whistleblower Protection Act ("HinSchG") and the German Act on Corporate Due Diligence Obligations in Supply Chains ("LkSG") and explain the process and principles of the complaint procedure.

The personal designations used in this document are directed equally at people of all gender identities. For the sake of better readability, we have refrained from using double entries and opposite-gender terms so that screen readers can function without barriers.

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1. SCOPE OF APPLICATION

These rules of procedure describe the handling of reports and complaints (hereinafter "complaints") that relate, among other things, to violations of duty related to human rights and the environment as well as to risks related human rights and the environment that arise from the Feddersen Group's economic activities in our own business area or at suppliers of the Feddersen Group.

However, the complaints procedure does not cover the handling of complaints relating to the products or services offered by the Feddersen Group. For these concerns, the relevant customer service department will be happy to assist you.

The complaint procedure is accessible to all persons. Both employees of the Feddersen Group and any external legal or natural person can use the Feddersen Group's complaint procedure.

2. PROCESS OF THE COMPLAINT PROCEDURE

2.1. Contact and submitting complaints

The complaint can be submitted in text form via the free online reporting system "BKMS". It can be accessed via the following link:

<https://www.bkms-system.com/feddersen-group>

- Complaints can be submitted at any time via the online reporting system.
- The system can be accessed via various terminal devices (computer, smartphone, etc.).
- The input mask is available in four languages: German, English, Portuguese, Chinese.
- The submission of the complaint can also be made in common languages. (If required, a translation of the complaint will be carried out using an online translation tool or by involving a translator committed to confidentiality).
- The report can be submitted anonymously.

The complaint is forwarded to the Compliance Officer of K.D. Feddersen Holding GmbH or the representative for processing. In processing the complaints, the Compliance Officer or the representative may be supported by other persons involved by them, depending on the characteristics of the case. All persons involved act impartially, independently of instructions and are bound to secrecy.

Specific information is helpful for the processing of the complaint. If possible, the whistleblower should specify in which company of the Feddersen Group the described risk exists or a violation is alleged to have occurred. In the event of a risk or violation at business partners or (in)direct suppliers, these should also be named if possible. Furthermore, in addition to a detailed description of the incident, complaints shall, if possible, contain information on the continuation of the risk or violation.

2.2. Mailbox and confirmation of receipt

When using the online reporting system, whistleblowers have the option of setting up a digital mailbox to receive feedback, answer questions and provide information on the progress of the complaint.

The postbox can be used anonymously at any time.

The installation of the mailbox enables the confirmation of receipt, which the person submitting a complaint receives within seven days.

2.3. Investigation of the complaint & clarification of the case

Complaints received are documented in the whistleblower portal. The persons involved in processing the complaint check the facts presented in the complaint for relevance to the complaint procedure. If the complaint does not fall within the scope of the complaint procedure, the processing of the report ends and the whistleblower is informed.

Depending on the facts of the case, the complaint is assigned to a processor. The complaint is checked for plausibility to determine whether there are sufficient indications of (potential) grievances with compliance relevance in the sense of the complaint procedure. If it is possible to contact the whistleblower via the mailbox, the facts of the case can be discussed and, if necessary, further information relevant for the processing of the complaint can be obtained.

The processor ensures that all information necessary to assess the complaint is taken into account. If the processor determines that there are no risks related human rights or the environment and that there have been no violations of duty related to human rights or the environment in the Feddersen Group's own business area and at (in)direct suppliers, the procedure ends and the whistleblower is informed.

It is only possible to inform the whistleblower if a mailbox has been set up.

2.4. Duration of the procedure

Receipt of the complaint will be confirmed to the whistleblower within seven days, provided that a mailbox has been set up.

The processing time varies depending on the complaint and the complexity of the case. The persons involved in processing the complaint aim to clarify the facts and close the report within 14 days.

2.5. Possible outcomes of the complaint procedure

If the investigation of the complaint confirms relevant risks or violations of duty (cf. 1 or 2.3), it will be examined which preventive or remedial measures are necessary.

For example, risks related to human rights or the environment or violations of duty related to human rights or the environment to which employees of the Feddersen Group have contributed may lead to appropriate disciplinary measures being taken. In the case of such violations of duty to which suppliers of the Feddersen Group have contributed, business relations may also be suspended or terminated, depending on the severity of the violation, after unsuccessful attempts with milder means.

The measures taken are documented in a comprehensible manner, tracked and archived in an audit-proof manner in the whistleblower portal in accordance with legal requirements.

3. PROCEDURAL PRINCIPLES

3.1. Confidentiality of the complaint procedure

The persons entrusted with the complaint procedure always treat the information they obtain in the course of processing the complaints as confidential. In particular, personal data is treated confidentially in accordance with the GDPR.

An exception to this are any existing official or statutory disclosure and reporting obligations.

3.2. Whistleblower protection

The complaint procedure is implemented with the utmost care and diligence in order to address risks related to human rights and the environment as well as violations of duty related to human rights and the environment in accordance with statutory requirements. The Feddersen Group does not tolerate any discrimination, intimidation or hostility against the persons who use the complaint procedure with the intention of clarifying relevant risks and violations. Violations of the principle of whistleblower protection can in turn be reported via the whistleblower portal.

If the Feddersen Group becomes aware of disadvantages or reprisals of the whistleblowers by third parties, the Feddersen Group reserves the right to take appropriate countermeasures.

Whistleblower protection does not extend to situations where intentionally or grossly negligently untrue information is reported through the complaint procedure.

3.3. Further procedural principles

Data protection and information security

The online reporting system ensures data protection and information security in accordance with the respective applicable legal requirements. The operator of the reporting system has demonstrably no interpretable access to the reporting and case data at any time.

Only the personal data required to process the complaint procedure will be processed and stored. After the end of the procedure, the personal data is anonymised or deleted in compliance with existing retention periods.

Presumption of innocence

Complaints are processed objectively and in accordance with the presumption of innocence.

Principle of proportionality

In order to fulfil the purpose of the investigation, appropriate measures within the framework of the complaint procedure must be suitable, necessary and reasonable.