

RULES OF PROCEDURE FOR THE COMPLAINTS PROCEDURE UNDER THE LKSG

PURSUANT TO SECTION 8(2) OF THE ACT ON CORPORATE DUE DILIGENCE OBLIGATIONS IN SUPPLY CHAINS (LKSG)



Our complaints procedure allows persons to report actual or potential issues relating to human rights or environmental rights. These may be issues in our supply chains or in our own business area. These rules of procedure describe the matters that may be reported, how reports can be submitted and what happens after a report has been submitted.

We are happy to answer any questions about the procedure, either directly via the reporting system using the contact option under “Responsibility for the complaints procedure” or by emailing compliance@optibelt.com.

SCOPE

In principle, all matters relating to violations of human rights or environmental rights can be reported via this reporting system. Specific examples include:

Human rights violations:

- Child labour
- Forced labour and slavery
- Discrimination and unequal treatment
- Disregard for freedom of association
- Withholding an adequate living wage
- Working conditions that pose a risk to health
- Unlawful forced evictions or unlawful taking of land
- Unlawful use of private or public security forces
- Pollution of water, soil and air that may contribute to human rights violations

Environmental law violations:

- Use of mercury (in accordance with the Minamata Convention)
- Use of persistent organic pollutants (in accordance with the Stockholm Convention)
- Environmentally unsound storage, handling, import and export of hazardous waste (in accordance with the Basel Convention)

SUBMITTING REPORTS AND COMPLAINTS

We recommend submitting reports via our digital reporting system, which can be accessed via our website (under the “About Optibelt” menu, in the “Compliance” section).

Reports can be submitted in the languages available in the reporting system. Reports can be submitted around the clock. Reporting persons may remain completely anonymous if they wish. Even if reporting persons disclose their identity, confidentiality and the protection of personal data are guaranteed in all cases because an external law firm acts as the first point of contact.

A personal electronic mailbox can be set up in the system, allowing reporting persons to remain in contact with our company after submitting a report while remaining anonymous. Use of the system is, of course, free of charge for the reporting person.

PROCEDURE

All incoming reports are handled in accordance with a structured process, as described below.

1. Receipt of the report

Once a report has been received via the digital reporting system, reporting persons receive an acknowledgement of receipt, usually within seven days. Reports submitted via the digital reporting system are initially received by an appointed law firm, which checks for any potential conflicts of interest involving our internal reporting office and, where necessary, further anonymises the reports before forwarding them to the internal reporting office for processing.

2. Review of the report

The content of the report is then reviewed by our internal reporting office. Any questions arising at this stage can be clarified in dialogue with the reporting person. Further action is determined based on the content of the report. If the complaint is rejected, the reporting person will be given the reasons for the decision.

3. Clarification of the facts

If the procedure continues, the matter is discussed and reviewed with the reporting person, provided that the reporting person is willing to do so. Where appropriate, a procedure for amicable settlement may be offered.

4. Development of a solution

A proposed solution is developed in close consultation with the reporting person. Where relevant, agreements on remediation are reached.

5. Remedial measures

Remedial measures may be required to resolve reported issues. Where remedial measures have been agreed, they are implemented and monitored.

6. Review and conclusion

The outcome of the procedure is evaluated together with the reporting person.

The duration of the procedure depends heavily on the circumstances of the individual case and may range from a few days or weeks to several months. As a general rule, we endeavour to conduct the procedure as efficiently as possible and reach a satisfactory solution. We also always endeavour to keep the reporting person informed of the measures taken and further progress. When using the digital reporting system, we therefore recommend that reporting persons log in regularly and check their case for new messages.

RESPONSIBILITY FOR THE COMPLAINTS PROCEDURE

The reporting office of Arntz Beteiligungs GmbH & Co. KG, Corveyer Allee 15, 37671 Hörter, has central responsibility for our complaints procedure and is the primary point of contact for questions or comments:

Ms Regina Arning, Mr Konrad Ummen and Dr Julia Brand-Tuerkoglu
Telephone: +49 5271 62-203

We also recommend that reporting persons use the communication function in our digital reporting system, to address questions or comments directly to the responsible person.

PROTECTION AGAINST DISADVANTAGE OR PUNISHMENT

We work to ensure that reporting persons do not suffer any disadvantage or punishment as a result of their report. Retaliation in response to complaints or reports will not be tolerated. If the reporting person is employed by our company, this includes protection against dismissal, demotion, suspension, threats, harassment or any other form of discrimination relating to the reporting person's terms and conditions of employment.

If, for example, the reporting person is employed by a supplier, we work with the supplier to ensure that the person enjoys a comparable level of protection. To ensure that the reporting person is not subjected to disadvantage, punishment or similar retaliation, we endeavour to remain in contact with the reporting person even after the procedure has been concluded.