Michael Weinig AG

Code of Procedure for the Complaints Procedure under the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz, LkSG)

Last amended: September 2024

## Code of Procedure – Table of Contents

|  |  |  |
| --- | --- | --- |
| 1. | Introduction |  3 |
| 2. | Scope of Application (Areas of Protection) | 3 |
| 3. | Whistleblowing  | 4 |
| 3.1 | Who can provide information? | 4 |
| 3.2 | How can information be submitted? | 4 |
| 3.3 | What should I bear in mind when providing information? | 4 |
| 3.4 | Who will process my report? | 4 |
| 3.5 | Will my identity be treated confidentially? | 5 |
| 3.6 | Procedure after submitting a report | 5 |
| 3.7 | Will complainants be protected? | 6 |

# Introduction

As of January 1, 2024, WEINIG is obliged to implement the regulations of the German Supply Chain Act (LkSG). The LkSG obliges WEINIG to take certain due diligence measures to ensure that its own business activities and those along its supply chains are conducted responsibly with regard to human rights and the environment. Potential breaches must be prevented, mitigated or terminated.

The Act does not create any new human rights or environmental standards, but serves to ensure compliance with existing international agreements in order to improve the living and working conditions of people, particularly in the Global South, as well as certain aspects of environmental protection.

An essential element of the due diligence obligations defined in the LkSG is the establishment of a complaints procedure through which internal and external individuals can inform WEINIG of human rights violations or environmentally harmful activities and/or corresponding risks in their own business area and in the supply chain. All information received must be dealt with in a fair and transparent procedure. The LkSG is not restricted to WEINIG’s business activities in Germany. It applies to us and our suppliers worldwide. Accordingly, all subsidiaries of Michael Weinig AG are also liable.

The following pages of this Code of Procedure explain how the complaints procedure at WEINIG works in detail.

1. Scope of Application (Areas of Protection)

Information can be reported in the event of violations to or risks in connection with any of the following areas of protection:

* Protection of employees
* Protection of natural resources
* Protection from attacks through the deployment of security forces
* Protection when handling mercury
* Protection when handling persistent organic pollutants
* Protection when handling hazardous waste

The LkSG contains further subdivisions of the individual areas of protection in Section 2 (2) Nos. 1-12 and Section 2 (3) Nos. 1-8.

Please note, however, that no complaints about products or services of the WEINIG Group will be processed via the complaints procedure. Customer service is responsible for this.

1. Whistleblowing

3.1 Who can provide information?

Everyone! Employees as well as individuals and organizations that do not belong to the WEINIG Group. The complaints procedure is available to both internal and external individuals and institutions in order to draw attention to potential or actual human rights violations or environmentally harmful activities and/or corresponding risks that may arise in our own business area and at direct and indirect suppliers.

3.2 How can information be submitted?

Information can be submitted 24/7 via our digital whistleblower system. The corresponding link can be found on the WEINIG website ([www.weinig.com/de](http://www.weinig.com/de)) under the heading “WEINIG GROUP”. It is also possible to submit information by telephone or post.

3.3 What should I bear in mind when providing information?

Reports should be as specific and comprehensible as possible. Here are some points for guidance:

* **What happened?** (Describe the facts as clearly as possible.)
* **Who committed the violation?** (If known.)
* When did the violation occur and is it still ongoing?
* Who is affected or damaged by the violation?
* Where did the violation occur?
* Are there witnesses or documents that prove the violation?
* Can questions be asked or should the information be treated anonymously?

**All comments will of course be processed**, regardless of how detailed they are or whether the above questions have been answered or not. But the more information we have and the more specific it is, the faster and more efficiently the report can be processed.

3.4 Who will process my report?

All information is first recorded by the S-CON GmbH & Co KG, a company based in Hanover, which then forwards it to the WEINIG Group's Compliance Officer, Mr. Michael Petry. He reviews the information and informs the persons required or responsible for processing. In the event of human rights violations, the WEINIG Group’s Human Rights Officer, Mr. Michael Thomas, must take part in the procedure.

3.5 Will my identity be treated confidentially?

Yes! WEINIG protects you as a complainant. All reports will be treated confidentially. You can also submit a report without stating your name.

3.6 Procedure after submitting a report

The complaints procedure consists of 6 steps, which serve to process incoming reports. In the course of the procedure, care is taken to ensure that the complainant is involved in the resolution process in the best possible way and informed accordingly.

* + 1. Receipt of the report

Receipt of the report will be confirmed to the complainant without delay, but within 7 days at the latest. The report received will be documented for processing. The documentation is stored for a legally required period of 7 years and then deleted. The data is stored in accordance with the applicable data protection regulations.

* + 1. Investigation of the report

We will check whether the report received is related to a human rights violation or environmentally harmful activity and/or corresponding risks or if it is related to a violation of relevant obligations. The functional area responsible for processing the report is determined during the investigation. In the event of a rejection, the complainant will be given a reason, if possible.

* + 1. Clarification of the facts

The facts of the case are discussed. The complainant can be involved in this process in order to discuss open questions. When anonymous information is submitted, it cannot be ensured that the person providing the information can be involved.

* + 1. Taking remedial and preventive measures

If a human rights violation or environmentally harmful activity and/or corresponding risk or violation of relevant obligations is identified during the investigation, appropriate remedial and preventive measures will be initiated.

* + 1. Conclusion of the procedure

Where this is possible, the complainant will be informed of the status of the procedure within 3 months and will receive a brief summary of the measures taken. The Compliance Officer and/or the Human Rights Officer of the WEINIG Group shall monitor compliance with the remedial measures initiated. At the end of the investigation, the results are summarized in a report.

* + 1. Determining effectiveness of the procedure

The Compliance Officer and/or the Human Rights Officer of the WEINIG Group shall review the effectiveness of the complaints procedure annually or on an event-driven basis. An event-driven review is carried out if a significantly increased risk situation is to be expected in the company’s own business area or at direct suppliers. This can be the case, for example, when introducing new products, services or business areas. If necessary, appropriate adjustments will be made to the procedure.

All information will be processed as quickly as possible. The duration of the investigation can vary greatly depending on how serious and complex the matter is. If we are able and legally permitted to do so, we will inform you of any measures taken within three months. Certain rules of conduct must be observed during the investigation, for example:

* The complainant must be protected! Neither his/her name nor details from the report itself may be passed on without reason.
* All data and information must be treated confidentially.
* The investigation must be conducted fairly, objectively and respectfully.
* Persons accused in a report are presumed innocent until a violation has been proven. The investigations shall be open and unbiased.
* All accused parties have the right to be heard.

3.7 Will complainants be protected?

Yes! WEINIG does not tolerate retaliation of any kind!

Information can be submitted without providing contact details. Any follow-up communication can also be handled anonymously. Non-anonymous information will of course also be treated confidentially.

WEINIG does not tolerate any disadvantages for complainants or any hostility or attempts to intimidate them. Any reprisals against complainants of which we become aware will be punished immediately to the extent permitted by law.

The following measures serve to protect the complainant:

* All information will be received only by a small, pre-determined and specially trained group of people.
* Any information that allows conclusions to be drawn about the identity of the person providing the information will be treated confidentially. This also applies after the conclusion of the procedure.
* Only the necessary groups of people are involved in the complaints procedure. It is ensured that all persons involved in the procedure shall act impartially and that they are obliged to handle the information received confidentially.
* The company’s internal documentation is stored for seven years in accordance with legal requirements and then destroyed.