

## Rules of Procedure

Complaints Procedure (Section 8 of the German Supply Chain Act –  
*Lieferkettensorgfaltspflichtengesetz – LkSG*)

Valid from: 01 January 2024

### 1. Scope of application

Indications of human rights violations and breaches of environmental laws and regulations within the Alzchem Group and at direct suppliers can be reported via the following complaint channel.

### 2. Complaints channel

The complaints procedure can be accessed via the following link:

<https://alzchem.hinweisgeberexpertemeldeplattform.de/>

### 3. Responsibilities and contact persons

The complaints are received by our authorised representative and processed by the responsible employees of the Alzchem Group, if necessary with the support of other technical experts. The contact person and authorised representative for the complaints procedure is the compliance service provider "Hinweisgeberexperte" (Compliance Beratung + Service Rechtsanwalts-gesellschaft mbH), who can be contacted at the following e-mail address: [info@hinweisgeberexperte.de](mailto:info@hinweisgeberexperte.de).

### 4. Cycle of the complaints procedure

The complaint is received by our authorised representative. The person making the complaint receives confirmation of receipt and is informed of the next steps and the timetable.

Firstly, as part of an initial assessment, our representative checks whether the reported violation falls within the material scope of the complaints procedure. Further prerequisites for the initiation of a clarification of the facts are that the process described must be assessed as plausible and possible in principle and could constitute a violation of a law or a serious violation of an internal rule. It is also checked whether the data collection, processing and utilisation taking place as part of the investigation is permissible under data protection law.

The aim of the investigation is the neutral, competent and objective clarification of the facts that are the subject of the report. The facts are clarified by suitable persons who are independent and sworn to secrecy. They maintain contact with the whistleblower, check the validity of the report received and, if necessary, request further information from the whistleblower. Indications of violations at direct suppliers are investigated together with them.

The review is carried out on the basis of documents and discussions and is documented in a comprehensible manner in a case file. The case files for which there is no justified interest in retention are deleted once a year. The whistleblower receives feedback on the progress of the procedure within three months of confirmation of receipt. Feedback will only be provided insofar as this does not affect internal investigations and the rights of the persons who are the subject of a report or who are named in the report are not affected.

Each case concludes with a written final report, which is strictly confidential. The report distribution list depends on the type and severity of the offences identified and is determined individually for each case. Information is only passed on to the extent necessary and authorised under data protection law.

The final report contains sanctions and appropriate measures to remedy the irregularities and prevent similar violations in the future. Once the investigation has been completed, the whistleblower receives feedback on the results of the investigation and the follow-up measures, if legally permissible.

## **5. Protection from reprisals**

Whistleblowers who provide information in good faith in order to uncover irregularities enjoy special protection at the Alzchem Group. Our representative and the responsible internal employees of the Alzchem Group ensure that they are protected by the highest level of confidentiality and, where legally possible, by ensuring their anonymity. For whistleblowing at the Alzchem Group, this means that the identity of the whistleblower will only be known to the persons responsible for receiving reports or taking follow-up action.

The Alzchem Group uses the complaints procedure to ensure that whistleblowers who have reasonable grounds to believe that their information is true are not hindered, restricted or influenced in their whistleblowing.

The Alzchem Group will not tolerate retaliation or other negative consequences for whistleblowers in connection with whistleblowing. Named whistleblowers should not fear retaliation, such as suspension, dismissal, reassignment of tasks, disciplinary action, discrimination, harassment or similar retaliation by their employer as a result of whistleblowing.

## **6. Inadmissible complaints**

A complaint that accuses third parties or employees with malicious intent and against their better judgement is expressly not permitted. Such reports, which are obviously intended solely to harm, denounce or denigrate other persons, will not be processed. In such cases, the person providing the information does not enjoy any special protection against reprisals and may be held liable.

\*\*\*