

# Code of Procedure

## Preamble

An effective complaints procedure within the Supply Chain Act's meaning by §§8, 9 LKSG is essential to Engbers GmbH & Co KG. The complaints procedure has two central functions, which are elementary for the company.

Firstly, the complaints procedure operates as a **proactive early warning system**, a testament to our commitment to identifying and resolving issues before they escalate. It is designed to identify problems and, ideally, fix them before harm is done to people or the environment. The company aims to gather information on human rights, environmental risks, or inadequate preventive and remedial measures as early as possible, thereby preventing further human or ecological rights violations or hazards.

Effective complaints procedures also ensure access to **appropriate remedial action** when needed. If the company receives information or complaints about imminent or actual breaches of duty that are confirmed, it is ready to prevent, end, or at least minimize these issues by taking remedial measures by § 7 LSKG. Additionally, it is prepared to take preventive measures by § 6 LSKG to avert or reduce the risk of further violations of the same kind.

These rules of procedure, in line with the provisions of the Supply Chain Act, are crucial in ensuring the transparent and regulated handling of complaints related to potential human rights due diligence violations. The Supply Chain Act provides the legal framework within which Engbers GmbH & Co KG operates, and the complaints procedure is a vital part of this framework. We are committed to keeping you informed and involved in our operations, fostering a sense of transparency and trust.

## §1 Purpose and scope of application

- (1) These Rules of Procedure are guided by and uphold the provisions of the Supply Chain Act, which is of utmost importance in our operations.
- (2) These Rules of Procedure apply to all parties, including affected persons (employees, suppliers, and other stakeholders), companies, and interest groups.

## §2 Submission of a complaint

- (1) Complaints by the Supply Chain Protection Act (i.e., compliance with human rights in global supply chains, e.g., protection against child labour, right to fair wages, and safety of the environment) can be submitted in writing or electronically to the responsible person.
- (2) The complaint must contain all relevant information, including the date and details of the incident, the parties involved, any measures already taken, and any supporting evidence such as documents or photographs.

### **§3 Responsibility and processing**

(1) Gudrun Robers, a trusted company employee, is responsible for handling complaints under the provisions of the Supply Chain Act.

(2) The person responsible examines incoming complaints and decides within one month whether to initiate further measures. These measures may include conducting interviews with relevant parties, gathering additional evidence such as documents or photographs, or involving external experts, such as environmental consultants or human rights lawyers, to clarify the incident.

(3) If necessary, the person responsible shall conduct a thorough investigation, cooperating with relevant authorities, companies, and other parties to ensure complaints are thoroughly investigated and appropriate measures are taken. This thorough investigation process is designed to reassure you of our commitment to addressing complaints seriously and effectively.

### **§4 Response to complaints**

(1) The controller shall respond to incoming complaints within two months and inform the complainant of the investigation's status.

(2) The responsible party's response shall contain information on the investigation carried out, any violations of the Supply Chain Act found, and the measures taken or planned to remedy the situation.

### **§5 Confidentiality and data protection**

(1) The controller shall treat all complaints confidentially and comply with the applicable data protection regulations.

(2) The personal data of complainants will only be used to process the complaint and will only be passed on to third parties if this is required by law or necessary to resolve the complaint.

### **§6 Final provisions**

(1) These Rules of Procedure shall enter into force **on 01.01.2024** and apply until revoked.

(2) Amendments to these Rules of Procedure require the written consent of those responsible.

To access the whistleblower system, visit our company website, scroll to the bottom, and click on the 'Whistleblower system (Hinweisgeber-System)' button provided. From there, rest assured that your reports can be submitted anonymously and will be treated with the utmost care and diligence.

Reports made anonymously further ensure our effective whistleblower system. Moreover, Mrs. Gudrun Robers, the person responsible, enjoys the most significant possible independence from management and a very high reputation and trust within the company.

If you have further questions, please contact our Human Rights Officer at [supplychain@engbers.de](mailto:supplychain@engbers.de) or Mrs. Gudrun Robers at [robers@engbers.de](mailto:robers@engbers.de) for any specific complaints or concerns.

## **Process of the complaint's procedure**

### **1. receipt of the complaint or notification**

A receipt is confirmed and documented by the person providing the information.

### **2. examination of the complaint or indication**

The complaint or indication is examined, and further procedures and responsibilities are determined. In the event of a rejection, the whistleblower will receive a statement of reasons.

### **3. clarification of the facts**

The facts of the case are discussed and examined with the whistleblower. An amicable dispute resolution procedure may be an option.

### **4. working out a solution with the whistleblower**

Based on step 3, a proposal for remedial action is developed in dialogue with the whistleblower. If necessary, agreements on compensations are made.

### **5 Remedial measures**

The agreed remedial measures are implemented and followed up.

### **6 Review and finalization**

The result achieved should be evaluated together with the whistleblower, ensuring a thorough review process.

## **7 Effectiveness review**

The procedure's effectiveness is reviewed annually and ad hoc, demonstrating our commitment to continuous improvement. If necessary, adjustments are made to the procedure, or corrective measures are taken.