

## **Procedural instructions for the Dorfner Group's complaints procedure**

### **Scope of application**

These procedural instructions outline the principles for processing reports of potential misconduct within our own business area and throughout our supply chains.

It is binding for employees involved in the complaints handling process.

In general, the processes described in this procedure manual apply, when the official reporting channels described are utilized.

The complaint handling process is designed to receive and address reports of potential misconduct; it is not intended for addressing any performance-related customer concerns or complaints. Such concerns should be addressed to the contact person responsible for supporting the respective customer.

### **Introduction & Procedure Outline**

In the event of a (potential) grievance, both our employees and external third parties have the opportunity to report the discovered grievance to our complaints office.

You can contact our complaints office by

- to the website <https://report.hintcatcher.com/dorfnergruppe>,
- contacting us by telephone on 0911-6802-335,
- meeting a local contact person in person if necessary.

In case of digital or telephone complaint, the complaints office receives the complaint, documents it and confirms receipt to the person making the complaint.

In a first step, the validity of the complaint is then examined; the aim is to clarify whether the complaint/report falls within the scope of the complaint procedure.

If it is possible to contact the whistleblower, the matter will be discussed with them as needed. This includes clarifying any questions of understanding or obtaining further information required for evaluation in order to gain a better understanding of the matter. Please note that if you submit a report through the digital reporting office, you will receive access data that will enable you to track the progress of the report.

If the reported matter not pursued any further, a notice is sent to the reporting party.

If there are sufficient indications that a violation of the rules is occurring or has occurred, it will be examined what specific investigative or clarification measures are necessary.

Depending on the results of this second step, business decisions are taken in a possible third step in order to respond appropriately to any grievances identified and, in the event of grievances in the company's own business area, countermeasures are implemented to prevent further violations in the future.

**Confidentiality**

The complaints office and any other employees involved in the complaints procedure will treat the information they receive confidentially. The identity of the whistleblower will not be disclosed, insofar as this is desired and legally possible.

**Protection of the whistleblower from adverse effects**

Any form of retaliation against the whistleblower is inadmissible. Reprisals include all unjustified disadvantages such as dismissal, denial of promotion, changed assignment of duties, disciplinary measures, discrimination or bullying, but also non-renewal of fixed-term employment contracts.

Discrimination, intimidation, hostility and / or other retaliatory measures against the whistleblower are inadmissible, will not be tolerated and will be sanctioned within the scope of the legal possibilities up to the termination of the respective employment relationship (in our own business area) or the termination of the business relationship (with suppliers).

The same applies to the impairment or obstruction of investigations, in particular the influencing of witnesses and the suppression or manipulation of documents or other evidence. If there is evidence of such measures, the complaints office must be contacted immediately.

**Expenses**

The complaints procedure itself is free of charge for the person making the complaint. Any costs incurred in connection with the complaints procedure (such as the costs of legal advice) will not be reimbursed.

**Effectiveness of the complaints procedure**

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis, for example if we have to reckon with a significantly increased risk situation in our own business area or at a direct supplier.