

## **Code of procedure for complaints as per § 8 of the German Supply Chain Due Diligence Act (LkSG)**

Compliance with ethical principles and responsibility for sustainable action are central for trans-o-flex<sup>1</sup>. With a view to improving protection of human rights and environmental standards in the area of our own commercial activity and throughout our supply chain, we have set up a complaints procedure which fulfils the requirements of the German Supply Chain Due Diligence Act (LkSG).

The present code of procedure provides the most important information on our procedure for handling complaints pertaining to human rights and the environment.

### **1. What is the aim of the complaints procedure?**

The complaints procedure should provide an opportunity for disclosures to be made in respect of human rights-related or environmental risks in the sphere of trans-o-flex's own commercial activity and throughout its supply chain. This enables us to take appropriate action before people or the environment come to actual harm (early warning system).

However, breaches of duty which have already occurred in respect of human rights and environment-related obligations may also be disclosed, so that damage can be directly averted or minimised (access to appropriate corrective action).

### **2. Who can make disclosures or complaints?**

Both internal and external individuals can make disclosures or complaints vis-à-vis potential human rights or environmental risks and violations.

### **3. What kind of complaints or disclosures can our complaints procedure be used for?**

The complaints procedure can be used for all breaches of duty in respect of human rights and environmental concerns which fall within the sphere of commercial activity of trans-o-flex or one of their suppliers. In particular, breaches of duty vis-à-vis human rights and the environment include the following:

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<sup>1</sup> The trans-o-flex Express GmbH & Co. KGaA enterprise group includes all the companies in which it holds, directly or indirectly, a share of at least 50%.

- Ban on child labour, forced labour and all forms of slavery
- Disregard for protection in the workplace, and work-related threats to people's health
- Disregard for the right of association
- Ban on discrimination in the area of employment
- Ban on failure to pay the minimum wage
- Destruction, due to environmental pollution, of natural resources people rely on for their livelihood
- Illegal violation of land rights
- Proscribed manufacture, use and/or disposal of mercury
- Proscribed production and/or use of materials which come under the Stockholm Convention (Persistent Organic Pollutants, or "POPs"), as well as non-environmentally friendly treatment of waste containing POPs
- Proscribed import/export of dangerous waste as per the Basel Convention

#### **4. What channels are there available to make a disclosure?**

Complaints and disclosures in respect of human rights and environmental risks or violations may be made via the following channels:

- By email to: [compliance@tof.de](mailto:compliance@tof.de)
- By post to:

trans-o-flex Express GmbH & Co. KGaA  
Legal/Compliance Department  
Hertzstrasse 10  
69469 Weinheim  
Germany

- In person: having arranged an appointment with the compliance officer via [compliance@tof.de](mailto:compliance@tof.de)

We do not charge the whistleblower any fees for them making disclosures, or for processing them.

## **5. Who processes complaints and disclosures?**

The compliance department is responsible for processing complaints and disclosures. All those authorised to carry out the complaints procedure are impartial, are not bound by instructions in the exercise of their duties, and maintain confidentiality.

## **6. How are whistleblowers protected from detriment and sanctions due to them making a complaint or disclosure?**

Fostering a transparent corporate culture represents a top priority for us. For this reason, protection of confidentiality, and the protection of whistleblowers from detriment and sanctions represent essential elements of our complaints procedure.

Regardless of the method chosen to make the disclosure, we ensure that the identity of the individual and the information disclosed are treated in confidence.

If so desired, the reporting office will remain in contact with the whistleblower after the complaints procedure has completed to ensure that the whistleblower is not subsequently threatened with retaliatory action.

## **7. How does the complaints procedure proceed?**

Within one week, the whistleblower shall receive confirmation from the compliance department that their disclosure or complaint has been received, as long as there is a channel of communication available.

Disclosures received via channels for making disclosures other than the channels set out in this code of procedure are forwarded to the compliance department, which shall, within a week, confirm having received the disclosure in question.

The compliance department shall then check whether the complaint or the subject of the disclosure made falls within the remit of the complaints procedure. If the complaint or disclosure is rejected, the whistleblower, insofar as this is possible, shall receive a brief explanation of the reasons. If insufficient information is available, the compliance department, insofar as possible, shall contact the whistleblower to request further information. If further information is not available, and the person cannot be contacted, the procedure shall be discontinued.

If the compliance department acknowledges that the disclosure falls within the scope of the complaints procedure, the matter shall be investigated thoroughly. If needed, other departments shall also be involved, while, at all times, the principle of confidentiality and data

protection regulations shall be observed. As this investigation is carried out, if required, and insofar as possible, the matter shall be discussed with the whistleblower.

If, during the course of the investigation, it becomes apparent that the disclosure or complaint is well-founded, suitable preventive or corrective action shall be undertaken. The compliance department shall monitor implementation of the agreed action.

The duration of the complaints procedure depends on the complexity of the complaint or disclosure.

Insofar as possible, the whistleblower shall be informed of the outcome of the complaints procedure.

The effectiveness of the procedure shall be reviewed on an annual basis, and when the situation demands. If required, changes shall be made to adapt the procedure or courses of action taken.