

Rules of Procedure for Complaint Procedures pursuant to section 8 Supply Chain Due Diligence Act (LkSG [*Lieferkettensorgfaltspflichtengesetz*])

I) Introduction

VACUUMSCHMELZE GmbH & Co. KG and its companies are committed to upholding human rights and protecting the environment. It is the declared goal of the company management to respect, protect and promote human rights and the environment along the entire value chain. Violations of internationally anchored human rights or national and international environmental protection regulations will not be tolerated. VACUUMSCHMELZE GmbH & Co. KG takes appropriate and effective measures to identify, verify and prevent the realization of risks in its own business unit and throughout the entire supply chain. The human rights and environmental due diligence obligations include the establishment of an effective complaints procedure through which whistleblowers can report violations, risks and other issues.

These rules of procedure explain the process of submitting and processing incoming information. They describe how the complaints procedure can be accessed, who is responsible for the complaints procedure, what the specific process looks like once a complaint has been received and what measures are taken to protect whistleblowers. The complaints procedure aims to enable whistleblowers to contact us easily and securely so that risks and violations in the supply chain relating to human rights and the environment can be detected at an early stage and any violations that have occurred can be minimized and remedied.

II) Addressees and scope of the complaints procedure

The complaints procedure is publicly accessible and available to all people, whether at home or abroad. The complaints procedure makes it possible to draw attention to human rights or environmental risks as well as of violations of human rights or environmental obligations arising from the economic activities of VACUUMSCHMELZE GmbH & Co. KG and/or its companies or in the supply chain.

III) Procedure sequence

Irrespective of the reporting method used to submit a tip, the procedure is uniform from the time the tip is received.

1. Responsibility for the complaints procedure

Only employees who act impartially, are obligated to maintain confidentiality and are not subject to any instructions as part of the complaints procedure are responsible for receiving and processing tips.

2. Submitting a tip

People providing tips generally have different reporting channels at their disposal:

- An web-based reporting portal that can be accessed in multiple languages via the following link: [Osapiens Complaints System](#)
- Tips by mail can be sent to the following address: VACUUMSCHMELZE GmbH & Co. KG, Grüner Weg 37, 63450 Hanau

Tips can be submitted confidentially and anonymously. On the web-based reporting portal, the processing status of a tip submitted via the portal can be tracked.

3. Receipt of a tip

Once a tip is received, the person providing the tip receives a confirmation of receipt. The confirmation of receipt is usually sent immediately; however, the transmission of the confirmation of receipt may be delayed by up to two weeks.

4. Processing a tip

After the tip is received, the tip is centrally reviewed and assigned to a clerk. Tips on VACUUMSCHMELZE GmbH & Co. KG companies will be forwarded to the clerk at the company concerned if necessary. The responsible clerk maintains contact with the person providing the tip. The responsible clerk analyzes the facts and discusses them with the person providing the tip if necessary. If a violation of human rights or environmental obligations is found, the responsible clerk immediately initiates remedial measures. If a tip results in a human rights or environmental risk without existing violation, the responsible clerk initiates preventive measures. Tips are taken into account in the risk analysis. The results of the factual analysis are communicated to the person providing the tip; if necessary, further steps are discussed with the person providing the tip.

Tips are usually ultimately processed within three months of receipt.

5. Anonymous submission of a tip

Tips can generally be provided anonymously. For anonymous submission of a tip, no data will be collected that allows conclusions to be drawn about the identity of the person providing the tip. If the person providing the tip provides information when submitting an anonymous tip that allows conclusions to be drawn about his or her identity, the information will be treated confidentially.

6. Confidential submission of a tip

In addition, the confidentiality of personal data and other information allowing conclusions to be drawn about the identity of the person providing the tip is guaranteed when a tip is submitted. Only the respective clerk and the person responsible for assigning tips can view a tip.

7. Documentation of tips

In accordance with section 10 para. 1 sentence 2 LkSG, tips are stored for seven years.