

# The complaints procedure under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG)

In implementation of the European Supply Chain Directive, the German Supply Chain Due Diligence Act (LkSG) came into force on 1 January 2023.

The law aims to minimise risks relating to human rights and the environment in companies and along the supply chain. To achieve this goal, the LkSG provides for the introduction of a suitable complaints procedure. This is intended to provide those affected whose human rights have been violated by the business activities of a company or its suppliers or other third parties who become aware of possible human rights or environmental risks and breaches of duty with easier access to remedial measures.

As a partner of integrity and reliability, we maintain such a reporting centre, which is accessible to both employees and third parties such as suppliers.

In accordance with the LkSG, the following rules of procedure provide a publicly accessible and easily understandable source of information about the LkSG's complaints procedure.

## 1. Reportable facts

Anyone can report imminent or actual violations of rights or other human rights or environmental risks and grievances at HÄFELE or in the supply chain. The term supply chain is interpreted broadly and includes both direct and indirect suppliers of HÄFELE.

The human rights and environmental risks result from § 2 para. 2 and para. 3 LkSG and include the following in particular:

- Any form of child and forced labour, economic exploitation and slavery;
- Non-compliance with health and safety regulations due to inadequate safety standards and protective measures;
- Unfounded unequal treatment in the employment relationship based on national or ethnic origin, social background, health status, gender, sexual orientation, age, political opinion, religion or belief;
- Violation of minimum wage regulations;
- Improper storage and disposal of waste and hazardous substances.

This list is not exhaustive. In cases of doubt, you can provide a tip-off and seek advice from our Reporting Office Investigation Officer or the Compliance Officer.

## 2. Procedure

A transparent and efficient procedure is required in order to process committed or imminent violations as completely as possible. We have therefore defined the following procedural stages, which are broken down from reporting to the conclusion of the procedure.

**a) Reporting risks and violations within the supply chain**

**What?** Impending or actual violations of legal rights or other human rights or environmental risks (see above).

**How?** Information can be provided anonymously or by stating your identity to the following reporting possibilities:

**External reporting centre****Dr. Jochen Bernhard**

Menold Bezler Rechtsanwälte,  
Stresemannstraße 79, 70191 Stuttgart  
Tel. +49 711 860 40 611  
Fax: +49 711 860 40 299

E-Mail:

ombudsmann-haefele@menoldbezler.de

Languages:

German, English, French

**Compliance Officer****Dr. Carmen Mutz**

Häfele SE & Co KG,  
Adolf-Häfele-Straße 1, 72202 Nagold  
Tel. +49 7452 95 353

E-Mail:

compliance@haefele.de

Languages:

German, English

The report can be submitted in person, in writing, electronically or by telephone.

If the report is submitted in anonymised form, the whistleblower must state in their report which channel they would like to use to be informed about the progress of the procedure and to be contacted in the event of queries.

The incident should be described in as much detail as possible. The report should include the following details:

- What happened?
- Who was involved?
- When and where did the incident take place?
- Is the incident still active?
- What is your relationship with HÄFELE? (*employee, temporary worker; former employee, supplier, employee of supplier, ...*)
- Was the incident actively perceived?
- Do you have a direct, personal interest in the matter?

Information can already be submitted at the stage of initial suspicion.

**b) Receiving and processing reports - checking the scope and confirming receipt**

We take reports received seriously and process them immediately. We will first check whether the report falls within the scope of the complaints procedure. It will then inform the whistleblower in writing, electronically or verbally about the receipt of the report, the processing status and its relevance.

**c) Clarification of the facts**

We will take all necessary investigative measures to clarify the matter and we may have to contact the person who provided the information again. In the case of anonymous

reports, it is particularly important to name a communication channel in order to enable us to make further enquiries. It is possible to use an e-mail address that does not allow any conclusions to be drawn about the identity of the reporting person. If the report is submitted with the identity of the person, this data will be treated confidentially.

**d) Conclusion of the investigation and taking remedial action**

The complaints procedure is either discontinued for lack of evidence or other reasons or, in the case of a substantiated tip-off, brought to a conclusion in consultation with the whistleblower. The result achieved is then evaluated with the whistleblower.

**3. Documentation and confidentiality**

All incoming reports are documented and stored in a permanently retrievable manner in compliance with the confidentiality requirement and data protection and are only recorded with the prior consent of the whistleblower.

The recordings are destroyed after the statutory retention periods have expired.

**4. Protection of the whistleblower and the person concerned**

All whistleblowers are protected from being penalised or disadvantaged as a result of using the complaints procedure. The identity of the whistleblower is treated confidentially.

In addition, all measures are taken to ensure that the whistleblower suffers no disadvantage as a result of the report. In particular, it is ensured that no labour law measures are to be feared as a result of the report. In the case of employees in the supply chain, HÄFELE will use its influence to prevent any reprisals associated with the report.

**5. Regular review of the effectiveness of the complaints procedure**

Based on the findings from the complaints received and the risk analysis, we review the effectiveness of our complaints procedure on an annual and ad hoc basis and adjust it if necessary.