

PROCEDURAL INSTRUCTIONS ON THE COMPLAINTS PROCEDURE

1. Purpose of the instructions

Full compliance with laws, ethical principles and internal regulations is a top priority for HAGER SE and the companies affiliated with the aforementioned company under company law (hereafter referred to individually or collectively as "**HAGER**"). Only when laws and internal ethics and compliance rules are observed can damage to HAGER, its employees, business partners and other stakeholders be averted at an early stage.

Any form of misconduct in HAGER's own business area and in the supply chain must therefore be identified at an early stage and immediately remedied. This requires the attention and willingness of all managers, employees, business partners and other stakeholders to point out possible violations and misconduct in the event of concrete indications.

HAGER has therefore set up an internal whistleblower system that can be used to report violations of laws, regulations, and ethics as well as human rights and environmental risks or violations. These rules of procedure govern the procedure following a received report.

The whistleblower system fulfils both the requirements of the Whistleblower Protection Act (HinSchG) and the requirements relating to the complaints' procedure under the Supply Chain Due Diligence Act (LkSG).

Let's Talk – Integrity Alert System



Legal framework



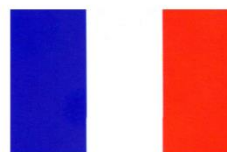
EU Whistle-blower
Protection Directive
(2019/1937)

General Data
Protection Regulation
2016



Whistle-blower Protection Act
(HinSchG 2022)

Supply Chain Due Diligence
Act 2023



Loi Sapin II 2016
(relative à la transparence, à la lutte contre
la corruption et à la modernisation de la vie
économique)

Loi Waserman 2022
(visant à améliorer la protection des
lanceurs d'alerte)

In principle, whistleblowers can choose whether to contact the aforementioned internal company whistleblower system or an external reporting office (see the further information on the website of the Federal Office of Justice under "Whistleblower Office" (BfJ - Hinweisgeberstelle (bundesjustizamt.de))). However, whistleblowers should preferentially report to the company's internal whistleblowing system in cases where effective internal action can be taken against the violation, and they do not fear reprisals.

2. Scope of Application

The complaints' procedure can be used by employees and business partners of HAGER as well as by external third parties, to draw attention to

- human rights and environmental risks,
- the violation of human rights-related and environmental obligations and
- other actual or potential violations of legal or internal company regulations

that have occurred in our business area or along our supply chain.

3. Complaint Channels

Complaints can be submitted as follows:

External channels

- **Online reporting form in your language:**
<http://www.safecall.co.uk/clients/hagergroup>
- **Local Safecall telephone number:**
please click [here](#) to access the list of telephone numbers.

Internal channels

- **In person:**
Ethics Team & Ambassadors
You can contact the Ethics Officer directly at ethics@hagergroup.com, a member of the Ethics Team or one of the Ethics Ambassadors worldwide (contacts available on the intranet). Reports will be registered and treated confidentially and handled in accordance with the regular complaints' procedure.

HR & Manager

The HRBP, manager or employee representative is also a reporting channel as they are required to report concerns to the Ethics Officer.

Safecall is a UK-based service provider that has been supporting large corporate groups and medium-sized companies with the implementation and operation of integrity reporting systems for over 20 years. Safecall employees act as trustworthy, objective, and external interlocutors for employees and business partners. The various reporting channels guarantee a secure and professional reporting system.

4. Confidentiality and protection

The employee you speak to is in the same time zone as you. Safecall guarantees absolute confidentiality and anonymity, if desired, in compliance with the latest data protection regulations. Calls are not recorded; only handwritten notes are taken.

If a whistleblower chooses anonymity, it is impossible for HAGER to identify him/her. Whistleblowers have the choice between complete anonymity, revealing their identity only to Safecall, or revealing their identity to HAGER. We respect the decisions of everyone.

Safecall's role includes receiving the reports, translating them if necessary, and reporting them to our Ethics Officer within 24 hours. If the information concerns an acutely dangerous situation, Safecall will contact our Ethics Officer within 2 hours. We are also supported by Safecall in the context of follow-up questions to the whistleblowers, in particular regarding the translation of reports and their forwarding in the event of anonymity.

In line with our due diligence culture, all reported matters are carefully reviewed by our Ethics Officer and brought to an appropriate conclusion.

We take the confidential treatment of all reported matters very seriously and only involve the minimum number of reviewers required. They are impartial, independent in the performance of their duties, not bound by instructions, and obliged to maintain confidentiality and to protect the rights of whistleblowers and other affected persons. They sign both a confidentiality agreement and a declaration of absence of conflicts of interest.

The clarification of facts, discussion, and investigation of incoming information are always carried out in strict confidence. In exceptional cases (e.g. criminal offenses), however, the legal obligations to provide information to the authorities must be observed.

The reporting platform enables communication with the whistleblower via an anonymous mailbox. The system does not store technical data that allows conclusions to be drawn about the person making the report (i.e., IP address, location data, device specifications, etc.). The personal data of the whistleblower is only collected if he/she wishes to provide this data. If the whistleblower discloses his/her identity or names other people in the report, this will be treated confidentially during further processing and in the follow-up of the report.

No whistleblower needs to fear reprisals on the part of HAGER due to a report made in good faith. Any reprisals against whistleblowers will be punished.

5. Procedure



5.1 Receipt of a complaint

Once a report has been received, its receipt is documented in the whistleblower system.

The whistleblower will be informed immediately, at the latest within 48 hours of the receipt of their report, provided that a response is possible, and the whistleblower does not submit an anonymized report that does not allow a response.

5.2 Review of the complaint

The Ethics Officer will check whether the received report contains sufficient information to investigate the matter.

If there is insufficient information, the Ethics Officer, if necessary, with the support of Safe-call, will contact the whistleblower and request further information. If neither sufficient information is available nor is it possible to make contact, the case will be closed.

5.3 Clarification of facts

The Ethics Officer investigates the facts of the case themselves or forwards it to the responsible office in the company for investigation, taking into account the principles of confidentiality and data protection. If necessary, the facts of the case are discussed with the whistleblower.

Whenever

- the criticality of an alert reaches a high level or
- the Group Ethics Officer deems it necessary to call on the expertise of the reduced Compliance Committee or
- the alert concerns the categories Fraud, Anti-Bribery, Conflict of interest, Anti-trust/Competition Law, Trade Compliance, Data Law, or the Supply Chain Due Diligence Act

the Ethics Officer regularly reports to the reduced Compliance Committee.

If necessary, the Ethics Officer or the reduced Compliance Committee checks whether the investigation team has sufficient resources to conduct the investigation conscientiously and in accordance with the applicable ethical rules.

If the internal investigation reveals allegations or suspicions that go beyond those that led to the opening of this internal investigation, it is up to the Ethics Officer or, if necessary, the reduced Compliance Committee to determine the appropriate action and, if necessary, to decide whether to open a separate internal investigation if the allegations are of a different nature.

The Ethics Officer shall convene an Ethics Committee to make a final determination.

If, in the opinion of the Ethics Officer or the reduced Compliance Committee, after clarification of the facts, discussion and investigation, it is established that there is no violation or risk in accordance with the scope of application defined in Chapter 2, the case will be closed. Finally, the whistleblower is informed that the case has been closed.

5.4 Development of a solution

If the Ethics Officer or the reduced Compliance Committee is convinced, after clarification of the facts, discussion, and investigation, that there is a violation or risk in accordance with the scope of application defined in Chapter 2, a proposal for further action, including preventive and remedial measures, will be drawn up. If possible, the whistleblower will be involved in this process.

5.5 Conclusion of the procedure

The whistleblower will be informed of the conclusion of the procedure, provided that it is possible to make contact. If the report was made via the electronic whistleblower system, the whistleblower can find out about the status of the investigation directly in the system.

The Ethics Officer will ensure that all conditions are met to complete the investigation.

HAGER will endeavour to remain in contact with the whistleblower after the investigation has been completed to ensure that the whistleblower is not put at risk of retaliation.

The processing time varies depending on the facts of the case and can therefore take from a few days to several months. HAGER endeavours to process and conclude all reports and subsequent investigations promptly.