

**Complaints procedure in accordance with the
German Whistleblower Protection Act
(Hinweisgeberschutzgesetz, HinSchG) and the
German Act on Corporate Due Diligence
Obligations in Supply Chains
(Lieferkettensorgfaltspflichtengesetz, LkSG)**



Whistleblowing Guidelines

Complaints procedure in accordance with the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG) and the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG)

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1 Introduction and scope of application

Compliance with the principle of legality and responsible, fair and sustainable action have always been top priorities for our family business. We believe that this form of corporate approach is essential to our long-term success. However, we can only achieve this together with our business partners. We therefore require that they comply with laws, human rights and environmental and social standards, and expect this from all our partners, suppliers and employees.

Violations of applicable law and/or internal regulations jeopardise the long-term success of the company. This could harm binder's reputation or prove detrimental in other ways, such as causing the suspension of orders or requiring the restitution of damages or payment of penalties. Those involved may be subject to repercussions under labour law or face claims for damages or criminal proceedings. Reporting possible violations or risks helps prevent such negative consequences.

The binder whistleblowing system via the channels mentioned in Section 2.2 serves as an early warning system, allowing the reporting of potential violations of applicable law and internal regulations. Our Compliance team maintains and is responsible for the whistleblowing system on behalf of the management. Any reports received are investigated immediately. If a violation is identified in the course of such an investigation, it will be remedied and the necessary measures taken to prevent future violations.

These Guidelines set out binder's principles for submitting reports using the reporting channels specified below. They take various legal requirements into account, including the requirements of EU Directive 2019/1937 on whistleblower protection and the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG).

The procedure described here applies to all German companies of the binder Group and is enacted and monitored by the Compliance team.

2 Whistleblowing definitions

2.1 Authorised reporter

Any person or organisation that has become aware of a possible violation of applicable law or internal regulations can report a potential violation within the company or anywhere in the supply chain.

2.2 Where can reports be submitted?

Information or reports can be submitted via the following channels.

2.2.1 binder Whistleblowing System

<https://binder-connector.integrityline.app/>



The Whistleblowing System is accessible 24 hours a day, seven days a week and in five languages. It can be used for secure communication with the Compliance team by setting up a secure mailbox. You can submit reports either stating your contact data or anonymously (see Section 2.4).

2.2.2 Telephone

Information can be reported in German or English on +49 7132 325-777 between 9 am and 3 pm (Central European Time).

2.2.3 E-Mail

compliance-team@binder-connector.de

2.2.4 Post

Franz Binder GmbH & Co.
Elektrische Bauelemente KG
Rötelstrasse 27
74172 Neckarsulm
Germany

2.2.5 Personal contact

Make an appointment in advance with our Compliance team at compliance-team@binder-connector.de or by phoning +49 7132 325-777

2.3 What kind of information can be reported?

In principle, any information about potential violations of applicable law and internal regulations can be reported.

Information about possible violations by business partners, especially suppliers, can also be reported, along with breaches of human rights or environmental protection risks.

2.4 Can information also be submitted anonymously?

People can generally report anonymously if they wish and if not prohibited by law, e.g. via the binder Whistleblowing System (see Section 2.2.1). The Whistleblowing System also enables communication with the Compliance team without revealing your identity, using the secure mailbox. We recommend setting up a secure mailbox for any queries or information under the Whistleblower Protection Act or LkSG. The requirements for communication and information according to Section 3, "Further procedure after receipt of a report", can only be applied if we have a means of communicating with you.

3 Further procedure after receipt of a report

3.1 What happens after a report is received?

Depending on the channel and contact option selected, receipt of the report will be confirmed in writing.

3.2 How is the report processed and checked?

Once the report is received, it is checked and documented by our Compliance team.

If the subject of the report is possible misconduct in the binder Group's own area of operations, the Compliance team will enact the onward process or do so in conjunction with another unit (e.g. HR or Legal), depending on the demarcation of internal responsibilities.

If the report concerns misconduct by a supplier, the information is immediately passed on to the responsible department (e.g. Purchasing). The whistleblower will be notified of this via the Compliance team.

If there are sufficient indications of a violation, the report will be investigated immediately in strict compliance with existing legal boundaries, especially in relation to data protection, and taking binder's Compliance Guidelines into account. For processing purposes, the responsible unit can also ask questions of the person who made the report via the Compliance team in order to clarify any unanswered points and, if necessary, obtain further information. Depending on the specific case, a check may then be carried out to determine what follow-up measures need to be taken. These may include initiating an internal or external investigation or, in the event of violations relating to the supply chain, setting up supplier discussions or audits.

The person providing the information shall receive feedback on the status or outcome of the procedure in accordance with the legal requirements to be observed in the respective country. If follow-up action is not initiated following a report concerning the supply chain due to a lack of evidence, or if the implementation of the follow-up action is discontinued, the person who provided the report shall also be notified of this.

3.3 How long does it take to process a report?

In principle, reports are treated with the highest priority. The time it takes to process a report depends on the scope, complexity and nature of the reported matter, so this can take anywhere from a few days to several months.

3.4 What might be the outcome of a report?

If a violation of applicable law or internal regulations is confirmed, it will be rectified as quickly as possible and the necessary measures will be taken to prevent future violations of this type (e.g. implementation of process improvements or possible HR measures).

4 Principles for the protection of persons involved

4.1 How are whistleblowers protected?

Any form of discrimination against whistleblowers is prohibited and will not be tolerated. This includes intimidation of whistleblowers or negative consequences under employment law as a result of reporting. Besides prohibiting discrimination, internal control bodies and a specially

protected documentation system are implemented to protect whistleblowers as effectively as possible. This includes ensuring the option of anonymous reporting, unless this is prohibited under locally applicable law.

If discrimination nevertheless occurs, this is a violation of our Code of Conduct and applicable law. Discrimination against whistleblowers may also be reported as a violation via the aforementioned channels.

Persons who report risks to human rights and the environment and violations of human rights and environmental due diligence to the best of their knowledge and belief are protected by binder and do not have to fear any action that would be detrimental to them. This applies even if reports do not prove to be justified upon closer examination. Excluded from this are reports that deliberately or grossly negligently contain untrue statements. If a false report is deliberately made by the person providing the information (e.g. in order to falsely accuse colleagues), this may lead to adverse consequences and possibly result in HR measures.

4.2 How is confidentiality ensured?

The units responsible for processing the reports always treat the information provided as confidential. This applies in particular to personal data. During such processing, only the persons or units necessary to process the information are informed. The identity of the persons providing the information is not disclosed, insofar as this is desired and legally possible. Statutory and official notification obligations are excluded from this.

4.3 Is personal data protected?

The information provided will be handled in accordance with the GDPR. Details of the processing of personal data, access to personal data and more can be found in the Privacy Policy for the Whistleblowing System.

<https://www.binder-connector.com/en/privacy>