

ASB Group

**External rules of procedure for the complaints
procedure under the Supply Chain Due Diligence
Act**

Table of contents

External rules of procedure for the complaints procedure at the ASB in accordance with the Supply Chain Due Diligence Act	3
1. The complaints procedure has a personal and material scope of application.....	3
Anyone can report violations	3
2. You can submit your report on the complaints procedure via a digital reporting channel	3
The digital signaling channel contains several input channels	4
Please use the "Report misconduct in the supply chain" input channel for reports on the complaints procedure	4
You can report data protection violations directly to the data protection officer via the separate reporting channel	5
The ASB Group GmbH Complaints Committee is responsible for your report	5
3. Certain procedural principles apply to the reporting of violations	5
You can report violations openly or anonymously.....	5
The more specific your tip, the better.....	5
False accusations or denunciations do not correspond to our culture of values	5
4. The complaints procedure follows certain steps.....	6
Every report you make will be processed by the Complaints Committee	6
You can submit your report in your national language via the digital reporting channel (in text form or by voice message)	6
.	6
You will receive a confirmation of receipt after submitting your notification	6
We check the complaint for plausibility and the existence of a suspicion	6
If there is any suspicion, your report will be examined in detail	7
The case manager clarifies the facts with you	7
The case manager will work with you to find a solution.....	7
Remedial measures are jointly implemented and tracked.....	7
You receive feedback on the result achieved	7
We ensure the confidential treatment of your report	7
The case managers act impartially.....	7
5. Whistleblowers are protected from discrimination or punishment	8
We protect you as a whistleblower from discrimination or punishment.....	Fehler! Textmarke nicht definiert.
We protect your identity as a whistleblower.....	8
We comply with the statutory data protection requirements at all times.....	8
6. If we detect a violation, we will take sanctions or other measures	8
7. We are further developing our complaints procedure	8

External rules of procedure for the complaints procedure at the ASB in accordance with the Supply Chain Due Diligence Act

As a responsible company, compliance with laws, rules and internal regulations is a top priority for the ASB Group. Only if rules and standards are adhered to can we prevent harm to our employees, our business partners and ourselves as a company.

Against this background and in fulfillment of the requirements of the German Supply Chain Due Diligence Act ("LkSG"), ASB Group GmbH, which is obliged under the LkSG, operates a complaints procedure for reporting information relating to human rights and environmental risks and the violation of human rights and environmental obligations in its own business area and along the supply chain.

The complaints procedure is a confidential and secure reporting system that ensures a high level of protection for whistleblowers.

1. The complaints procedure has a personal and material scope of application

Anyone can report violations

You can use the complaints procedure as an ASB employee or as an external person in particular if you are potentially affected by human rights or environmental violations in ASB's own business area or in the (direct and indirect) supply chain of the ASB Group. This may be the case, for example, if you are either an ASB employee yourself, an employee of direct or indirect suppliers or a resident in the vicinity of local ASB Group sites or direct or indirect suppliers.

The "supply chain" refers to all products and services of the ASB Group. It includes all steps in Germany and abroad that are necessary for the manufacture of products and the provision of services, from the extraction of raw materials to delivery to the end customer, and covers the actions of the ASB Group in its own business area, the actions of a direct supplier and the actions of an indirect supplier.

The "own business segment" covers all activities of the ASB Group to achieve the corporate objective. This includes all activities for the creation and utilization of products and the provision of services, regardless of whether they are carried out at a location in Germany or abroad.

A "direct supplier" is a party to a contract for the supply of goods or the provision of services whose supplies are necessary for the manufacture of the ASB Group's product or for the provision and use of the relevant service.

An "indirect supplier" is any company that is not a direct supplier and whose supplies are necessary for the manufacture of the ASB Group's product or for the provision and use of the relevant service.

You can submit reports for complaints or indications of human rights or environmental risks and violations

You can report information on human rights risks and environmental risks pursuant to Section 2 (2) and (3) LkSG and on violations of human rights-related or environmental obligations pursuant to Section 2 (4) LkSG along the ASB Group supply chain at any time.

These include, among others:

Risks and violations in the area of human rights:

- Child labor,
- Forced labor and slavery,
- Local occupational health and safety violations with accident or work-related health hazards,
- Disregard for freedom of association,
- Discrimination and unequal treatment in employment,
- Withholding an appropriate local (minimum) wage,
- Causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption,
- Unlawful eviction, deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person,
- Commissioning or using private or public security forces to protect the company's project if, due to a lack of instruction or control on the part of the company, the deployment of security forces o violates the prohibition of torture and cruel, inhuman or degrading treatment, o injures life or limb or o impairs the freedom of association and union.

Risks and violations in the area of environmental rights:

- Production of mercury-added products, use of mercury and mercury compounds in manufacturing processes and treatment of mercury waste,
- Production and use of persistent chemicals,
- Non-environmentally sound handling, collection, storage and disposal of waste and export and import of hazardous waste

2. You can submit your report on the complaints procedure via a digital reporting channel

The digital reporting channel of the ASB Group affected by the LkSG for the complaints procedure can be found on the ASB Group homepage.

The digital reporting channel is available around the clock.

The digital signaling channel contains several input channels

The digital signaling channel contains several input channels.

In addition to a channel for submitting reports for the complaints procedure in accordance with the LkSG, there is a channel intended for reports in accordance with a relevant whistleblower protection law and a link to the reporting channel to the data protection officer for reports of data protection violations.

Please use the "Report misconduct in the supply chain" input channel for reports on the complaints procedure

Please use the designated and labeled input channel "Reporting misconduct in the supply chain" for your report on the complaints procedure in accordance with the LkSG.

You can report data protection violations directly to the data protection officer via the separate reporting channel

Reports of data protection violations, such as breaches of personal data protection (see Art. 33 GDPR), should not be made via the digital input channel for reports on the complaints procedure in accordance with the

Supply Chain Due Diligence Act and not via the digital input channel for reports under the Whistleblower Protection Act. Reports of data protection violations should be made directly to the Data Protection Officer via the dedicated reporting channel.

You can contact the ASB Group's data protection breach reporting office at the following e-mail address:

datenschutz@asb-group.de

The ASB Group GmbH Complaints Committee is responsible for your report

A complaints committee set up centrally at ASB Group GmbH is responsible for processing your report.

This committee consists of representatives from the workshops and administration departments.

You can communicate directly with the case manager responsible for your report via the digital reporting channel.

You can also contact the central contact person responsible for our complaints procedure:

ASB Group GmbH

Praßreut 31

D-94133 Röhrnbach

We recommend communicating exclusively via the case manager and the digital reporting channel.

3. Certain procedural principles apply to the reporting of violations

You can report violations openly or anonymously

The digital reporting channel we provide also allows anonymous reports to be submitted. This means that you remain anonymous as a whistleblower. The decision as to whether you submit the report openly - stating your name and contact details - or anonymously is entirely up to you. In the case of an anonymous report, anonymous contact and anonymous communication between you and ASB Group GmbH is made possible.

The more specific your tip, the better

We process every report received and carefully investigate the reported facts.

In order to meet this requirement, we are dependent on the information you provide. The more specific and detailed you report violations, the better we can investigate the information. Please use the classic questions:

- What?** → What kind of violation has occurred?
- Who?** → Who committed the violation? Who else knew about it? Who was involved?
- When?** → When or over what period of time did the violation occur?
- How?** → How was the violation committed? Is there any evidence to document this?
- Where?** → Where was the violation committed?

False accusations or denunciations do not correspond to our culture of values

With our complaints procedure, we want to become even better in terms of compliance.

The complaints procedure is not intended to report false accusations or denunciations. Such behavior is not in line with our culture of values and ASB's claim to behave fairly and with integrity.

In this respect, the complaints procedure must not be used to make false accusations. The reporting of knowingly false information is prohibited.

4. The complaints procedure follows certain steps

Every report you make will be processed by the Complaints Committee

The creation of a transparent and confidential reporting channel is a prerequisite for an effective complaints procedure. ASB is therefore committed to processing every report comprehensively, initiating appropriate measures and clarify legal violations. Together, we will be able to put a lasting stop to misconduct and prevent it in the future.

We process your report efficiently and quickly within the required timeframe

The duration of the proceedings depends heavily on the facts of the case and can range from a few days and weeks to several months. We endeavor to bring the procedure to a satisfactory solution as efficiently as possible. In addition, we will keep you regularly informed about the progress of the procedure as part of the processing of the notification. We therefore recommend that you regularly log into the digital reporting channel and check your own case for new messages.

You can submit your report in your national language via the digital reporting channel (in text form or by voice message)

The digital reporting channel allows you to submit your reports in an official language recognized in your country. You can submit your report via the digital reporting channel (in text form or by voice message).

You will receive a confirmation of receipt after submitting your notification

We are committed to ensuring a transparent and fair processing procedure.

As a whistleblower, you can be sure that every report will be considered by the Complaints Committee and processed without delay. You will receive confirmation of receipt of the submitted report within seven days. Communication with you as the whistleblower takes place via a secure mailbox in the reporting system (you will receive a mailbox with login details for the digital reporting channel when you submit a report).

We check the complaint for plausibility and the existence of a suspicion

Confidentiality and data protection are our top priorities when processing reports.

The Complaints Committee receives your report submitted via the system and initiates the processing procedure. At the beginning of the process, the case manager checks whether the LkSG applies to your complaint or the subject of the report received and whether there is a suspicion of a risk or violation (plausibility check). If information is missing or requires further clarification, we will contact you via the mailbox to which you have been given the login details and ask questions.

queries. If your complaint is rejected for lack of suspicion, you will receive a brief explanation. You will receive such a justification no later than nine weeks after you have received the confirmation of receipt.

If there is any suspicion, your report will be examined in detail

In the event of suspicion, your report will be carefully investigated from a factual and legal perspective. The case manager will inform you about the next steps, the timeline of the procedure and how you will be protected as a whistleblower.

The case manager will clarify the facts with you

The case manager will contact you via your mailbox and discuss the facts of the case with you in order to gain a better understanding and clarify any unanswered questions. They will discuss with you what expectations you have regarding possible preventive or remedial measures. If necessary, further investigations will be initiated to clarify the facts.

The case manager will work with you to find a solution

The case manager will work with you to develop a proposal for a solution (remedy). If necessary, he or she will conclude an agreement with you to make amends.

Remedial measures are jointly implemented and tracked

Remedial measures agreed with you will be implemented by the ASB Group. Implementation is followed up by the Complaints Committee.

If the responsibility for a risk or violation lies with a direct or indirect supplier, the Complaints Committee requests the supplier to implement the corrective measure. The Complaints Committee reviews the implementation of the measure by the supplier in a timely manner.

You receive feedback on the result achieved

You will receive feedback on the steps and measures already taken and/or still planned within a maximum period of two months after a remedial measure has been agreed. However, it should be noted that this information can only be communicated to the extent that it is legally permissible and does not jeopardize further internal/external investigations.

We ensure the confidential treatment of your report

During the processing of the reports, we ensure that the reports are treated confidentially within the framework of the legal regulations - in particular with regard to your identity. The reports are only processed by authorized persons.

The case managers act impartially

The members of the Complaints Committee (case managers) act impartially when processing your report, are independent and are not bound by instructions. They are obliged to maintain confidentiality.

If we determine that the reported potential violation is related to a person who is a member of the complaints committee, this person will be excluded from processing the report.

5. Whistleblowers are protected from discrimination or punishment

We protect you as a whistleblower from discrimination or punishment

As a whistleblower, you do not have to fear any adverse measures by the company as a result of the report if you have made the report to the best of your knowledge and in good faith.

We protect you as a whistleblower from the negative consequences of a report within the framework of the statutory regulations and the scope of application of the Whistleblower Protection Act and ensure that no one is deterred from making a justified report out of fear of negative consequences or social pressure.

As a whistleblower, you are then protected,

- if you use a reporting point provided for in section 1 to submit information to the ASB,
- if the scope of application of the Whistleblower Protection Act is opened and
- if you do not knowingly, intentionally or recklessly submit false or misleading reports.

In the event of deliberately false information, you must expect sanctions, in particular measures under labor law, up to and including termination of the employment relationship.

We protect your identity as a whistleblower

We treat your identity as a whistleblower confidentially and protect your personal data in accordance with applicable law - especially vis-à-vis our suppliers. Unauthorized persons are denied access to the identity data.

We comply with the statutory data protection requirements at all times

It is essential for ASB to operate a complaints procedure that complies with the statutory data protection requirements in every respect.

6. If we detect a violation, we will take sanctions or other measures

We are committed to complying with laws, rules and internal guidelines. No deal or advantage, no matter how favorable, justifies a violation of laws or rules. We will not tolerate irregular or illegal behavior and will sanction it with appropriate measures, e.g. measures under labor law, up to and including termination of employment.

7. We are further developing our complaints procedure

We review the effectiveness of our complaints procedure at least once a year and on an ad hoc basis and adapt it if necessary.