

**Rules of Procedure in accordance with § 8 subs. 2 LkSG  
(German Supply Chain Due Diligence Act)**

**I. Establishment and purpose of the complaints procedure**

Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH, including all affiliated companies within the meaning of §§ 15 ff. AktG (German Stock Corporation Act) ("Company"), has set up an appropriate complaints procedure in accordance with § 8 LkSG (German Supply Chain Due Diligence Act). The complaints procedure enables persons to point out human rights and environmental risks as well as violations of human rights and environmental due diligence obligations that have been caused by the economic actions of a company in its own business area or by those of a direct or indirect supplier.

**II. Responsibility and contact**

The complaints procedure is handled by an external lawyer of trust (ombudsman), who can be contacted as follows:

**Dr Carsten Thiel von Herff, LL.M.**

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The lawyer of trust acts as an independent and autonomous lawyer. He is impartial and is not subject to any instructions by the Company regarding the substantive treatment of the case. The lawyer of trust is bound to secrecy. If desired, he shall maintain the confidentiality of the identity of a person providing information (whistleblower).

**III. Complaints procedure**

The lawyer of trust receives the complaint and, if necessary, discusses the facts with the whistleblower. In any case, the whistleblower will receive an acknowledgement of receipt after seven days at the latest.

The lawyer of trust examines whether a violation of due diligence obligations within the meaning of the LkSG or a breach of other laws or internal rules may exist. If there are sufficient indications of such a violation or breach, he will pass on the facts submitted to him to the Company for investigation in an admissible form. The lawyer of trust himself does not conduct an investigation in order not to jeopardise his impartiality.

The Company follows up the whistleblower information in compliance with the law and the internal rules and in consideration of the interests of all parties involved. The investigation should be conducted expeditiously and without major interruptions.

Persons affected by an investigation must be treated with fairness and respect. The presumption of innocence applies to all those affected. The right to be heard must be granted. Therefore, persons affected by a whistleblowing are notified as soon as possible of the information received and advised of their rights of access and rectification. However, if there is a serious risk that notification would jeopardise the investigation of the whistleblower information, this may be postponed until after the investigation has been completed or until the risk has ceased to exist.

The legal assessment of the facts under investigation and the determination of appropriate measures to eliminate and prevent improper business practices are carried out by the Company, which may consult the lawyer of trust for this purpose. Appropriate measures may include, for example, appropriate civil action or the involvement of an authority. Even if no violations are found in a specific case, proposals for changes in work and business processes as well as changes in organisational and behavioural rules may be appropriate.

The whistleblower may contact the lawyer of trust at any time to find out about the status of the case. Three months after receipt of the whistleblower information, the whistleblower will receive feedback on the follow-up measures to the information reported. The whistleblower will be informed of the result by the lawyer of trust within the limits of the law after the case has been closed at the latest.

#### **IV. Protection of the whistleblower**

The whistleblower is to be protected from discriminatory or disciplinary action. Any retaliatory action against them will not be tolerated. If there is any indication of retaliation against whistleblowers, the lawyer of trust must be involved immediately.

Where the lawyer of trust has given an assurance of confidentiality to the whistleblower, he shall not disclose their name and identity to the Company or to third parties without the consent of the whistleblower. Should the lawyer of trust be heard as a witness in criminal, civil or other proceedings, he will only disclose the name and identity of the whistleblower if he is permitted to do so in writing by both the whistleblower and the Company.

The whistleblower's interest in protecting their identity is opposed by the interest of the persons affected by the whistleblowing in the disclosure of the facts. For this reason, too, deliberate abuse of the opportunity to submit complaints and information will not be tolerated. The lawyer of trust is to point out to the whistleblower in the first interview that in the event of a deliberate abuse of the complaints procedure, their identity may be disclosed to the Company.

## **V. Data protection**

The lawyer of trust ensures compliance with the statutory retention obligations and the provisions of data protection law. The personal data collected are limited to information on the identity, function and contact details of the whistleblower and the affected persons, as well as to the other personal data that are absolutely necessary for handling the matter. In addition, only reported facts, processing details, follow-up of the whistleblower information and investigation reports are stored.

The retention period for personal data collected and recorded in the course of whistleblowing and investigations is two months of the conclusion of the investigation. This period shall be extended accordingly if the conclusion of the investigation is followed by disciplinary or judicial proceedings or other disputes for which the data must be used.

The Data Protection Officer reviews the data protection compliance of the complaints procedure on a regular basis.

## **VI. Effectiveness of the complaints procedure**

The effectiveness of the complaints procedure is reviewed once a year as well as on an ad-hoc basis in specific cases, for example if the Company has to expect a significantly changed or significantly expanded risk situation in its own business area or at the direct supplier, for example due to the introduction of new products, projects or a new business field.

As amended in September 2023