

**EJOT Complaints Procedure Rules  
on the German Supply Chain Act (LkSG) and  
on human rights and environmental risks and  
violations of human rights or environmental obligations**

The EJOT Group (hereinafter referred to as “EJOT”) is committed to respect human rights and the environment and to take responsibility for its supply and value chain.

We are therefore committed to respect human rights and environmental concerns within our business activities and in our global supply chains and to ensure that human rights and environmental violations are prevented, identified, and that affected parties have access to remedial action.

These rules of procedure provide information on the complaints procedure and the associated processes at EJOT.

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Insofar as only one gender-specific form is used in the following, this is for the sole purpose of better readability and simplification. This always refers to all genders. The term “employees” also includes managers at all levels and members of EJOT’s executive bodies.

**I. Uniform complaints procedure at EJOT**

EJOT operates a company-wide, transparent, public, uniform complaints and reporting procedure that is accessible free of charge.

All complaints and reports from employees or third parties are treated equally – insofar as this is legally permissible.

**II. Right to complain**

The complaints and reporting procedure is accessible to everyone. Employees as well as persons and organizations outside of EJOT can report complaints and indications both domestically and abroad.

**III. Reasons for complaints**

- Human rights and environmental risks and
- violations of human rights or environmental obligations arising from EJOT’s business activities or EJOT’s supply chain.
- Violations of laws or internal regulations of EJOT – in particular with regard to human rights and environmental risks or obligations.

Even the suspicion of possible violations and/or risks can be reported. The complaint or suspicion may be directed either against individual or several EJOT employees, in connection with EJOT's actions or with regard to a supplier or other contractual partner of EJOT.

#### **IV. Contact persons and complaints bodies**

The central contact person and central complaints body at EJOT is lawyer Winfried Schwarz, who is also the Chief Compliance Officer (CCO) and the Human Rights Officer of EJOT, whose contact details you will find below and which can be found at any time on the EJOT website under the following link:

<https://www.ejot.de/whistleblower>

The contact person is a self-employed lawyer and as such he is independent, impartial, bound to secrecy and not bound by instructions from EJOT. He will not disclose your identity. Therefore, please contact him personally, if possible, so that he has the opportunity to ask you any further questions.

He reports directly to the managing partner of the EJOT Group.

Mr. Schwarz can be reached by telephone at +49 163 5290860 and by e-mail at [compliance@ejot.com](mailto:compliance@ejot.com). This e-mail address is assigned exclusively to Mr. Schwarz and cannot be viewed by third parties.

If you wish to remain anonymous to Mr. Schwarz, you can anonymously write to him at the above e-mail address or by post at the following address:

Personal/Confidential  
Mr. Winfried Schwarz  
EJOT Holding GmbH & Co. KG  
Im Herrengarten 1  
57319 Bad Berleburg

Please feel also free to report complaints or comments in your local language. EJOT is able to translate and will involve local contacts if necessary. These local contacts will discuss any complaints or reports confidentially with the central complaints body.

#### **V. Confidentiality and protection against discrimination**

All complaints and reports are of course treated confidentially and can also be submitted anonymously without giving a name. It is particularly important for EJOT to treat the concerns of the reporting parties confidentially and to protect them. Confidential data may only be passed on if this is necessary and legally permissible. Our employees are also obliged to forward reports received to our complaints body confidentially.

Of course, EJOT protects all reporting parties from discrimination, punishment or other consequences as a result of a submitted complaint.

#### **VI. Confirmation of receipt of the complaint and further procedure**

As soon as a complaint is received by EJOT, the reporting party will receive an acknowledgement of receipt within a reasonable period of time – at least within seven (7) calendar days – unless this is not possible due to the anonymity of the report.

Subsequently, the facts of the case are discussed with the reporting party within a reasonable period of time and further measures are taken. The reporting party will receive a final notification of the results at the end of the procedure.

## **VII. Final provisions**

These Complaints Procedure Rules come into force on the day of their publication and supplement the existing EJOT codes. It was adopted by the EJOT management in December 2023.

The effectiveness of the complaints procedure is reviewed at least once a year and on an occasion-related basis.