

Rules of Procedure

on the Complaints Procedure in the Event of Violations of the Supply Chain Sourcing Obligations Act (LkSG)

1. Purpose and Scope of application

The purpose of these Rules of Procedure is to ensure the transparent presentation of the company's own complaints procedure within the meaning of Section 8 (2) LkSG of Hugo Kern & Liebers GmbH & Co. KG Platinen- und Federnfabrik with its registered office in Schramberg, including its affiliated companies within the meaning of Sections 15 et seq. AktG (hereinafter referred to as "Kern-Liebers"). The purpose of the complaints procedure is to enable persons to point out human rights and environmental risks as well as violations of human rights-related or environmental due diligence obligations pursuant to the LkSG that have arisen as a result of Kern-Liebers' economic actions in its own business area or the actions of a supplier.

The scope of application extends to

- Business partners (including suppliers, customers and cooperation partners)
- Internal whistleblowers
- External parties (including temporary workers, employees of external service providers)
- Other third parties

2. Complaint channels

Whistleblowers can send Kern-Liebers their complaint in German or English to the following email:

investigations@kern-liebers.com

to Kern-Liebers.

Furthermore, it is possible to submit the complaint by telephone by calling 0049-7422-511-318. The availability by telephone is guaranteed on working days in Germany from 10 a.m. to 3 p.m. (CET). The defined charges for a landline call apply to the call.

Complaints can also be submitted by mail:

Hugo Kern und Liebers GmbH & Co. KG Platinen- und Federnfabrik
Attn: Team Investigations
Dr.-Kurt-Steim-Strasse 35
78713 Schramberg

The contact details are publicly accessible, barrier-free and clearly visible on the company's website.



3. Procedure of the complaint procedure

3.1 Receipt of the notice

After a hint is received, its receipt is documented internally and the person making the hint receives an acknowledgement of receipt within one week, including the name of the contact person responsible for the process.

3.2 Examination of the report

The Complaints Office first checks whether sufficient information is available to review and investigate the facts reported.

If this is not the case, the Complaints Office will, if possible, contact the person providing the information to request further information. If neither sufficient information is available nor contact is possible, the case will be closed.

3.3 Clarification of the facts

The Complaints Office will investigate the facts of the case comprehensively itself or forward the case to the appropriate office, e.g. within the company, for investigation, while observing the principle of confidentiality and data protection. If necessary, and as far as possible in the case of anonymous hints, the complaints office or the responsible office will discuss the facts of the case with the person providing the hint and, if necessary, ask for further information.

If, after clarification of the facts, discussion and investigation, the complaints office or the responsible body is convinced that there are no human rights or environmental risks or violations of human rights or environmental obligations in its own business area or at suppliers, the case is closed.

3.4 Development of a solution

If the investigation confirms the existence of human rights and environmental risks or violations of human rights or environmental obligations in the company's own business area and at suppliers, a proposal for further action (in particular preventive and remedial measures) is drawn up.

3.5 Implementation and follow-up

The implementation of the proposed solution is finally followed up by the complaints office or the responsible body.

3.6 Conclusion of the procedure

The person making the referral is informed of the conclusion of the complaint procedure, if the possibility of contact exists.

The processing time is highly case-dependent and can therefore take from a few days to several months. However, Kern-Liebers will make every effort to complete the investigation in a timely manner.

4. Handling of hints

Regardless of which communication channel is chosen, Kern-Liebers treats all hints confidentially. However, we are required to comply with legal obligations to provide information to authorities as well as legal exceptions to the confidentiality requirement. The confidentiality of the identity of the person providing the hint and of the other persons named in the hint will be maintained throughout the entire process.

The person responsible acts impartially and is independent in the performance of his or her duties and is bound to secrecy.

5. Protection of the person providing the information

Protecting whistleblowers from being discriminated against or punished as a result of complaints or whistleblowing is an important part of our complaint process. Intimidation and retaliation against individuals who report actual or suspected misconduct in good faith will not be tolerated.

6. Review and Improvement

Kern-Liebers will conduct periodic and ad hoc reviews and continuous improvement of the grievance procedure.

Schramberg, March 20, 2023



Dr. Erek Speckert

President of the Board / CEO



Udo von Reinersdorff

CFO

