

# PROCEDURAL REGULATIONS FOR COMPLAINT PROCEDURES in accordance with § 8 (2) of the Supply Chain Duty of Care Act



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## Introduction

As from 01.01.2024, the HARTING Technology Group (HARTING) is subject to the Supply Chain Due Diligence Act (LkSG, Lieferkettensorgfaltspflichtgesetz) and must therefore set up a complaints procedure in accordance with § 8 (2) to (4) LkSG and establish publicly accessible rules of procedure in written form. The complaints procedure is implemented at HARTING through the already implemented whistleblower system and offers access to all potentially involved parties. The procedure enables individuals to draw attention to human rights and environmental risks as well as to report violations of human rights or environmental obligations that have arisen as a result of HARTING's business activities in its own business area or in those of a direct supplier.

## Who can submit reports/complaints pursuant to the Supply Chain Due Diligence Act?

"Whistleblowers" are all persons who draw attention to an incident that they consider to be a breach of regulations according to the meaning of the LkSG. The reporting system is therefore accessible to everyone at all times, i.e. both employees and external third parties can report complaints and information at any given time.

### I. How can reports be submitted?

The HARTING whistleblower system (BKMS) is a web-based system by the provider Business Keeper GmbH and enables a secure reporting channel for the whistleblower to report incidents. Based on the BKMS whistleblower system, incidents can be reported around the clock, seven days a week, in many languages. The system can be accessed via the link published on the HARTING website.

### II. Which reports can be submitted?

All complaints and information that indicate potential human rights or environmentally relevant risks and breaches of duty within the meaning of the LkSG can be the subject of the procedure.

Potential human rights risks and violations that may be the subject of the complaint/report may pertain in particular to the following aspects:

- Child labour
- Forced labour and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard of freedom of association, freedom of unionisation and the right to collective bargaining
- Unequal treatment in employment

- Withholding of an appropriate wage
- Destruction of the natural foundations of life through environmental pollution
- Unlawful violation of land rights
- Commissioning or use of private / public security forces that can lead to impairments and obstacles due to lack of instruction or control
- An act or omission in breach of duty that is directly capable of impairing a protected legal position (= further human rights) in a particularly serious manner and whose unlawfulness is obvious given all the relevant circumstances having been reasonably assessed.

Potential, reportable environmental risks and violations can take the following forms in particular:

- Violation of a prohibition resulting from the Minamata Convention, which aims to protect human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds into the air, water and soil.
- Violation of the prohibition on the production and/or use of substances within the scope and application of the Stockholm Convention (POPs) and environmentally unsound handling of waste containing POPs
- Violation of the prohibition on the import and export of hazardous waste within the meaning of the Basel Convention

### III. What are the requirements for a notification?

Whistleblowers are requested to consider the five W questions when reporting an incident: **Who? What? When? How? Where?**

In addition, the person providing the information should ensure that the report can also be understood by people outside the relevant area or field.

### IV. Course of the procedure

Once a report has been received, the company checks internally whether the report pertains to possible human rights violations or environmental concerns (see point II.). The receipt is documented in-house, at the company. If communication options were specified when the report was submitted or a mailbox was created in the BKMS reporting system (although this information is not a mandatory requirement for submitting a report), the person submitting

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the report will receive a corresponding confirmation of receipt and a case number within seven calendar days at the latest.

HARTING will take appropriate steps by way of the HARTING Compliance Line to investigate all the reported incidents regardless of the person or position involved. The team of the HARTING Compliance Line, which processes the incoming reports, consists of the AGG and Data Protection Officer and the Head of the Legal Department of HARTING Stiftung & Co. KG. Where necessary, external law firms are called in to deal with incidents.

The impartial and non-discretionary actions as well as the confidentiality of the HARTING Compliance Line are guaranteed when processing complaints and reports. Audits are therefore carried out confidentially and discreetly, taking the nature and complexity of the incidents into account.

The facts of the case are discussed (if possible and necessary) with the whistleblower with the aim of gaining a better understanding of the facts of the case and the measures to be initiated. It is particularly important to identify expectations with regard to possible remedial and preventive measures on the part of the whistleblower.

If communication options have been specified, the final result of the processing will be communicated to the whistleblower; insofar as the processing of the facts will take longer than three months, the whistleblower will be informed in the meantime.

## **V. Is my anonymity as a whistleblower guaranteed?**

HARTING will treat the identity of a whistleblower and the content of the report as strictly confidential and in accordance with the statutory provisions. The HARTING whistleblower system provides the option of anonymity. The whistleblower is free to decide at any time as to whether to remain anonymous or to disclose their name. Irrespective of this, every reference is treated in an equal manner. The BKMS system used is technically managed exclusively and independently of HARTING by Business Keeper GmbH, meaning that the anonymity of whistleblowers is guaranteed at all times. The reports are stored on separately protected servers of Business Keeper GmbH and the servers of HARTING's international law firms, which are bound by professional secrecy, and are inspected and reviewed by an employee of the HARTING Compliance Line and/or the relevant law firm.

## **VI. Do I have to fear reprisals as a reporting person?**

If whistleblowers report an incident in good faith, they do not have to fear any disadvantages, also in the incidence that the reported misconduct is not confirmed by subsequent research. Where necessary, state authorities are informed or violations of provisions subject to criminal prosecution are reported.

## **VII. Costs of the proceedings**

The reporting of information and complaints is free of charge for the person providing the information.

## **VIII. Monitoring and reviewing the effectiveness of the procedure**

The appropriateness and effectiveness of the complaints procedure is reviewed annually as well as on an ad hoc basis.