

# RULES OF PROCEDURE

for the complaints procedure of the companies of the

Friedhelm Loh Group

in accordance with the German Act on

Corporate Due Diligence Obligations in Supply Chains (LkSG)



Friedhelm Loh Stiftung & Co. KG (hereinafter "FLS") and its affiliated companies (hereinafter "Friedhelm Loh Group" or "FLG"), including Rittal and EPLAN, are aware of their responsibility towards the environment and society. Part of FLG's company principles is their willingness to take part in jointly shaping and improving them. Nevertheless, it is not always possible to prevent infringements of human rights or environmental obligations in advance and in every specific case. In case of any impairment, a point of contact is needed to collect and assess reports from observers and those affected. This complaints procedure has been established for this purpose.

## ***Who can submit complaints?***

The complaints procedure can be used by anyone – i.e. by both employees of FLG companies and external parties.

## ***What can be reported?***

The FLG complaints procedure can be used for any indication in conjunction with human rights and environment-related risks as well as violations of human rights and environment-related obligations, in particular those covered by Sections 2 (2) and (3) of the LkSG.

The reports can relate to circumstances or occurrences at FLG, one of its suppliers or other business partners.

For complaints related to other internal procedures or circumstances in conjunction with business activities of FLG companies (e.g., potential breaches of legal or internal regulations), a separate whistleblowing portal is available to all FLG employees at <https://friedhelm-loh-group.whistleblowing-portal.com/>.

### ***What channels are available for placing complaints?***

Complaints can be brought to the attention of the FLG companies in a target-oriented manner in two ways. Firstly, via a complaints portal for submitting complaints online that is available under the domain <https://friedhelm-loh-group.complaints-portal.com> (hereinafter "FLG Complaints Portal"). In addition, complaints can also be reported directly to a central mailbox:

LkSG-complaints@friedhelm-loh-group.com

Both channels are free of charge and available around the clock.

### ***What happens with received complaints?***

#### **1. Receipt of the complaints**

##### **a. FLG Complaints Portal**

You will be guided step-by-step on how to use the FLG Complaints Portal. Reports can be submitted there in any language. You can decide for yourself whether you wish to remain anonymous or provide your contact details.

After submitting the report on the FLG Complaints Portal, you will be shown a confirmation of receipt and a 16-digit confirmation code. Irrespective of the provided contact details, this code is necessary to view and edit the report again later if required. By using the code, queries stored in the chat can be answered without jeopardising a person's full anonymity.

The report submitted on the FLG Complaints Portal is viewed solely by experienced lawyers of BDO Legal Rechtsanwaltsgesellschaft (hereinafter "BDO"), who act fully independently of FLG. Following an initial plausibility check of the report and clarification of any queries, the person in charge then forwards the case to the FLS Legal Affairs Department. Your identity will only be disclosed with your prior consent.

##### **b. Central mailbox**

As an alternative to using the FLG Complaints Portal, you can also send complaints directly by email to the central mailbox specified above. A member of the FLS Legal Affairs Department reviews the reports and asks for additional information by email as needed. You will receive an acknowledgement of receipt by email within one week after your complaint has been received.

#### **2. Processing of the complaint**

The FLS Legal Affairs Department will coordinate the further processing of your complaint regardless of whether you submitted it on the FLG Complaints Portal or by email.

For a case to be handled and investigated appropriately, it is important to describe the incident as specifically as possible. If the initially submitted details are not sufficient, you will be asked to provide further information using the FLG Complaints Portal or the existing contact details. If sufficient information justifying further investigation cannot be ascertained despite the exhaustion of all the contact options, the case will be closed and you will be notified thereof.

If sufficient information is available, the case will be evaluated by the FLS Legal Affairs Department and (if possible after consulting you) will be forwarded to the FLG Ethics and Compliance Committee (EEC) with a proposal for further action. The ECC, which is headed by the LkSG Officer, comprises representatives from the Internal Audit and Legal Affairs Departments. The committee decides whether other specialist departments should be involved (in particular: Human Resources (HR) and the Security, Energy, Environment and Buildings Department (SEUB)) and what specific investigative measures should be taken and submits related decision papers to the FLG Executive Management. Meetings of the EEC are generally held once a month, or more frequently if specifically required.

### 3. Notification to the whistleblower

You will be informed about the progress of the investigation and the handling of your complaint via the communication channels available for the case in question (by email or in the FLG Complaints Portal). The actual duration of the procedure depends on the subject matter of the report and can vary accordingly. In any case, the Friedhelm Loh Group will try to give you feedback about any initiated or planned follow-up measures no later than 3 months after receipt of your report. You will also receive a message when the case is closed.

### ***How are whistleblowers protected?***

Both the lawyers from BDO and the persons within the FLG who are entrusted with processing cases are obliged to treat the information conveyed to them as confidential. Personal data is processed in accordance with the applicable data privacy requirements and in compliance with the German Act on Corporate Due Diligence Obligations in Supply Chains. It is guaranteed that no person entrusted with the case will attempt to establish the identity or IP address of reporting persons.

As a whistleblower, you are entitled to protection under these Rules of Procedure if you have reasonable grounds to believe that the information reported by you is true at the time it is provided and falls within the scope of application of these Rules of Procedure. In such cases, you do not have to fear any detrimental consequences such as mobbing, discrimination or dismissal. Your protection against any form of reprisal is assured and guaranteed.

If, during an investigation, it becomes evident that a complaint is completely unsubstantiated whatsoever and has been made solely to harm someone else maliciously or without justification and to discredit that person (abuse), the affected FLG company may respond

appropriately. In particular, it reserves the right to take legal action both for its protection and to protect its employees. This also includes disciplinary action if the abuse is perpetrated by an employee of an FLG company.