

Procedural Rules Governing Complaints

of noventic group companies

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noventic group

Procedural Rules Governing Complaints

Establishing an appropriate complaints procedure enables employees of the noventic group, and also third parties such as suppliers and business partners, to report observed human rights violations or environment-related violations within the meaning of the Supply Chain Due Diligence Act (Supply Chain Act) at companies of the noventic group or at suppliers.

The protection of human rights, environmental protection and the basic corporate values to which the noventic group and its subsidiaries are committed, are formulated and published in the noventic group Code of Conduct and Suppliers Code of Conduct, as well as in the noventic group Policy Statement concerning our Corporate Human Rights Strategy.

1. Scope

The Rules of Procedure apply to all complaints concerning potential human rights or environment-related risks and breaches of duty within the supply chain.

The following are examples of human rights risks and violations that may be the subject of a complaint, and of reportable environment-related risks and violations:

- Child labour
- Forced labour and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Unequal treatment in employment
- Withholding an adequate living wage
- Disregard for freedom of association
- Destruction of the natural basis of life due to environmental pollution
- Violation of the prohibition of the production and/or use of substances within the scope of the Stockholm Convention (POPs) as well as of non-environmentally sound handling of waste containing POPs (NB: The aim of the 2001 Stockholm Convention is to protect human health and the environment from persistent organic chemicals)
- Violation of the prohibition on the import and export of hazardous waste within the meaning of the Basel Convention

2. Whistleblowers

The complaints procedure is available to both internal and external persons. Specifically, these are employees of the noventic group, employees of direct and indirect suppliers and business partners as well as customers.

3. Meldekanäle für Beschwerden

For reports of complaints related to human rights and environment-related risks or breaches of duty, the company provides various reporting channels, including the possibility of anonymous reporting, which are made available on the Internet via the link <https://noventicgroup.integrityline.app>

This system is available at all times, in both German and English, to persons wishing to file reports.

4. Preserving Anonymity

It is possible to submit a complaint without revealing one's own identity, i.e. anonymously. In this event, in order to maintain contact between the complaints office and the reporting person, a secure mailbox will be made available, which can then be set up by the reporting person after the report has been sent. After filing the report, the reporting person receives a so-called "case ID" which, along with an individually chosen password, provides the access data for the secure mailbox. By entering this data, the reporter can view the report and send and receive messages to and from the complaints office.

5. Responsibilities and contact persons

The complaints are handled by the noventic group's Supply Chain Act management team, with the support of other experts if necessary. The contact persons are Nelly Bubenheim, who is responsible for sustainability at the noventic group, and Karl Richter, who is responsible for legal affairs and compliance.

The persons in charge of handling complaints are trained, independent and impartial and are not bound by any instructions. They are obliged to observe confidentiality.

6. Procedure

After receipt of the complaint, the reporting person will receive prompt acknowledgement of receipt, which must be sent within seven days of receipt of the complaint.

Checks will thereupon be made to determine whether the complaint may relate to possible human rights violations or environmental concerns. Receipt is recorded by the company.

The facts of the case will be discussed (if possible and necessary) with the reporting person or complainant with the aim of gaining a better understanding of the matter and determine the action to be taken.

The complaints officers will initiate investigations to determine whether the reported violations are well founded.

If the reporting person wishes, the Complaints Office will maintain contact with the complainant throughout the procedure,

If the matter is of a company-specific nature, further company-level personnel will if necessary be called in to assist in dealing with the case. The competence and trustworthiness of these personnel too are guaranteed.

Once the facts of the case have been dealt with, the reporting person (if he/she has disclosed his/her identity) must be notified in writing of the outcome. The complainant must receive feedback within three months. If investigating the matter takes longer than three months, the complainant must be notified thereof. Even if the investigation finds that the allegations cannot be substantiated, the whistleblower will be informed of this outcome.

7. Duration of the procedure

The duration of the complaint procedure will depend on the complexity of the subject matter of the complaint.

8. Protecting Whistleblowers from Discrimination and Reprisals

Protecting whistleblowers from discrimination or punishment for making a complaint is a major component of our complaints process. A person who submits a report in good faith may not be sanctioned or otherwise disadvantaged due to having submitted such a report.

- In order to ensure the protection of whistleblowers,
- reports are only dealt with by a small group of selected and specially trained employees,
 - all information, such as personal data and other details which would allow others to infer the identity of the whistleblower, must be treated as confidential. This remains the case after the conclusion of the procedure.

9. Data Protection Provisions

All stored personal data are subject to the statutory retention period. The Complaints Office is responsible for ensuring compliance with the relevant retention obligations and data protection provisions.

In the case of personal data collected in connection with complaints and investigations, the retention period is three months after conclusion of the investigations. This deadline will be extended accordingly if the conclusion of the investigation is followed by disciplinary or judicial proceedings or other disputes for which the data will be needed.

10. Review of the Efficacy of the Procedure

The adequacy and efficacy of the complaints procedure is reviewed annually and on an ad hoc basis.

Contacting the Compliance Department

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