

RULES OF PROCEDURE FOR COMPLAINTS AND WHISTLEBLOWING AT FLOTTWEG SE

in accordance with Section 8 of the Act on Corporate Due Diligence in Supply Chains (LkSG) and the Whistleblower Directive

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1. Purpose

These rules of procedure aim to provide a clear view on how complaints and whistleblowing are managed at Flottweg SE. The procedure is intended to enable persons to submit complaints or reports, which are defined under point 2, to the company.

2. Scope

a. Type of complaints

Any violation or suspected violation of human rights or environmental due diligence obligations under the LkSG. This suspicion may target Flottweg SE, its employees or its suppliers.

Any information on suspected cases relating to the Whistleblower Directive, such as allegations of corruption, fraudulent acts, antitrust or competition violations.

b. Who can submit complaints/reports

Complaints or information can be made by persons, who are directly or indirectly affected, e.g:

- Company employees
- Employees of direct and indirect suppliers
- Business partner
- Residents around company location
- Organizations, trade unions

3. What complaint options/channels are available

Complaints or notification can be submitted in the following ways:

- Using the integrity line (<https://flottweg.integrityline.com>)
- Directly to the Compliance Officers

Complaints or comments may be submitted in all languages available on the platform.

However, communication with our team currently has to be in German or English. If you do not speak these languages, an interpreter can be called in if necessary.

4. Contact person/responsibility

The Compliance Officers are responsible for reviewing the complaints and information received.

You can reach them under the following contact address:

compliance@flottweg.com

The main person responsible is Mr. Mathias Weber.

We assure you that those responsible in the Compliance department are not bound by instructions, which guarantees an independent assessment of complaints and reports.

5. Course of the procedure

The complaint or notification procedure is conducted in the following way:

- 1) Receipt of the complaint/report: All submitted complaints or reports will be acknowledged within a period of seven days.
Access to the integrity line to check the status of an existing report or for further communication with us is available by setting up a secure password over the website.
- 2) Examination of the complaint/report: An investigation of the complaint/report will be made to determine if it lies within the scope of this procedure. Complaints/reports within the scope will proceed and all parties will be notified about the next steps. Complaints/reports outside of the scope will be closed and all parties will be notified.
- 3) Clarification of the facts: Further communication (in person or via the secure channel) with the whistleblower will be necessary in order to find out, understand, and assess the exact facts of the case.
This serves to determine whether a violation exists or if the suspected breach is relevant.
If clarification of the matter takes longer than three months, you will receive latest every three months an update on the current processing status.
- 4) Developing a solution: When possible, Flottweg and the whistleblower will work together to prepare a solution for the circumstances.
If it is not possible to find a solution together, Flottweg will prepare a solution and inform the whistleblower.

- 5) Determine corrective measures: In conjunction with the solution developed, Flottweg will revise and, if necessary, redefine internal remedial measures to prevent a recurrence of the breach or suspected breach.
- 6) Conclusion: The whistleblower is notified via the platform of the completion of the procedure and the results.
- 7) Review of effectiveness: After completion of the procedure, internal audits will be conducted periodically to check whether the solution and the remedial measures taken have led to an improvement or elimination of the circumstances that led to the complaint/report.

6. Information on confidentiality and protection against discrimination

Flottweg's sustainability strategy demands that all employees shall be able to file complaints safely and without threat of discrimination. To that end, all complaints/reports will be held in strict confidence to safeguard personal data and protect against retaliation. Complaints/reports can be submitted anonymously, however, communication and the ability to investigate will be impaired and may lead to limited results.

Flottweg pledges that no employee will be discriminated against because of a complaint/report. All instances of workforce retaliation should be reported to the Compliance Officer at any time and will result in disciplinary measures for those responsible.

If you submit a report or complaint stating your name, we assure you that your personal data will be treated strictly confidential and will only be accessible to a limited group of people for the sole purpose of processing your complaint or report. Disclosure to persons who are not part of the handling of the specific complaint/report will not take place without your express consent.