



Rules of procedure

1. Purpose and scope of application

These rules of procedure regulate the EW GROUP GmbH complaints procedure within the framework of **the Supply Chain Due Diligence Act (LkSG)** and **the Whistleblower Protection Act (HinSchG)**. The aim is to ensure a secure, confidential and fair opportunity to report violations or risks in our own business area or in the supply chain.

The procedure is open to **all employees, suppliers and external third parties** who wish to report **information on human rights and environmental risks or violations** as well as **legal offences within the meaning of the HinSchG**.

2. Responsibility & Ombudsperson

EW GROUP GmbH has appointed an **independent ombudsperson** as the body responsible for the complaints procedure:

Dominik Bleckmann

Data Protection North GmbH

Konsul-Smidt-Str. 88, 28217 Bremen

Telephone: +49 421 6966 32 349

E-mail: compliance@dsn-group.de

The ombudsperson works autonomously, neutrally and independently. It ensures **that whistleblowers are protected from reprisals**. Data will only be passed on in cases permitted by law or with the express consent of the person making the report.

3. Access to the complaints procedure

Information and complaints can be submitted in the following ways:

- **In person** (by appointment)
- **In writing by post**
- **By telephone on +49 421 6966 32 349**
- **Electronically by e-mail to: compliance@dsn-group.de**

Whistleblowers can decide whether they wish to provide their contact details or remain anonymous. A **confirmation of receipt** will be sent within **7 days** if a contact option has been provided.

4. Course of the procedure

The complaints procedure is divided into the following steps:

1. **Submission of the complaint:** Via one of the above reporting channels.
2. **Acknowledgement of receipt:** Within 7 days if contact details have been provided.
3. **Examination & evaluation:**
 - Relevance of the report in the context of LkSG or HinSchG.
 - Check for plausibility and conclusiveness.
 - If necessary, enquiries to the reporting person.
4. **Taking measures:**
 - Internal investigations and clarification of facts.
 - Initiation of corrective measures.
 - If necessary, involvement of the responsible bodies.
5. **Finalisation and feedback:**
 - Within 3 months, the whistleblower receives information on the outcome of the investigation and any measures taken.

If it turns out that a report was **misused** (deliberately false or defamatory information), it cannot be followed up.

5. Protection of whistleblowers & confidentiality

- Whistleblowers are **protected against discrimination and reprisals**.
- The identity of the whistleblower is **treated confidentially**.
- Data is used exclusively for processing the report and is not passed on to uninvolved third parties.

6. Documentation & reporting

- All reports received are **documented and stored for 3 years**.
- The ombudsperson prepares **annual reports on the complaints procedure** to ensure the effectiveness of the procedure.
- The procedure is regularly reviewed and improved.

7. Publication and communication

These rules of procedure are:

- **Published on the company website** or made available on request.
- Communicated internally to employees and relevant stakeholders.
- Integrated into the compliance and supply chain processes of the subsidiaries.

This Procedure comes into force with immediate effect and applies to all EW GROUP GmbH companies.