



BUHLMANN

Rules of Procedure for Complaints

BUHLMANN Group

This complaints procedure is applicable to BUHLMANN Rohr-Fittings-Stahlhandel GmbH + Co. KG and all affiliated companies.



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Preamble

Respect for human rights and the environment is a high priority for the BUHLMANN Group. It is aware of its social responsibility in its business activities and wishes to encourage others to accept this responsibility and to act in the interests of protecting human rights and the environment.

Violations of human rights and environmental protection can have far-reaching consequences for the BUHLMANN Group itself, its employees and business partners, but above all, of course, for the people directly affected by the violations. The BUHLMANN Group has therefore set up a complaints procedure to enable any individual or group of individuals to provide information to all BUHLMANN Group companies so that possible violations can be identified at an early stage in order to avert or minimise potential harm and ensure access to appropriate remedial measures. The procedure is based on the rapid and professional processing of complaints and reports by external experts and the implementation of suitable remedial measures by the responsible departments.

This procedure is designed to make the complaints process as transparent as possible, to allay potential whistleblowers' fears of retaliation and to minimise the barrier to making a report or complaint. Information and complaints indicating human rights or environmental risks or breaches of duty are crucial for the BUHLMANN Group to continuously improve the working methods and selection processes of its direct suppliers with regard to such risks or breaches of duty.

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

Key information about the complaints procedure is summarised below.



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1 Who can submit information and complaints?

The complaints procedure is open to everyone. Complaints and hints can be submitted by employees as well as by people outside of the BUHLMANN Group.

2 What can be reported?

Any suspected or potential violation of applicable laws, internal policies and regulations, human rights, environmental protection or related due diligence obligations.

For example, the following violations or risks could be the subject of a report:

- Child labour, forced labour and any form of slavery
- Disregard for occupational health and safety and work-related health hazards
- Non-respect of the right to freedom of association and the right to collective bargaining
- Unequal treatment in employment
- Failure to pay a fair wage
- Destruction of the natural environment through pollution
- Illegal violation of land rights
- Use of private or public security forces in violation of human rights
- Violation of a ban under the Minamata Convention, which aims to protect human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds to air, water and land.
- Violation of the ban on the production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound management of waste containing POPs.
- Violation of the ban on import and export of hazardous waste under the Basel Convention.

3 Which channels can be used to make a complaint?

The central point of contact for complaints and information is the ombudsman of the BUHLMANN Group. Mr. Markus Klindwort is a lawyer and can be contacted at mail@rmk-partner.de. He can also be contacted anonymously.

Of course, a report can also be submitted to our Compliance Officer at any time at compliance@BUHLMANN-group.com or compliance.BUHLMANN@posteo.de.



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4 Who processes the complaints?

Depending on which of the complaint channels is used, either the ombudsman or the compliance officer processes the report or complaint. Both are impartial, independent, not bound by professional instructions, obliged to maintain confidentiality, appropriately trained and provided with sufficient time resources.

5 Is the identity of the whistleblower treated confidentially?

Yes, it goes without saying that all reports and complaints are treated confidentially. The anonymity of the person making the report or complaint will be guaranteed in all cases, especially if the report or complaint is received by our ombudsman. As a lawyer, Mr Klindwort is subject to a duty of confidentiality and may not disclose any information to third parties without consent.

6 Does the whistleblower receive confirmation of receipt of the report?

Yes, the whistleblower will receive an acknowledgement of receipt of the report or complaint as soon as possible, but no later than 7 days after submitting the report.

7 What is the procedure once a complaint or report has been received?

Every report and complaint received through one of the complaint channels is thoroughly investigated and processed. If the person handling the complaint determines that further information is needed for the investigation, the person providing the information will be contacted again, if possible. When contacting the whistleblower again, the whistleblower's expectations regarding the remedial action to be taken may also be discussed, unless this was already clear from the original report.

After a thorough review, the report will either be forwarded to the relevant departments for further investigation and clarification and for the implementation of appropriate remedial measures, or, if necessary, to a competent authority. During the investigation, the relevant department reviews all relevant documents and electronic data and, if necessary, speaks to witnesses and affected parties.



Appropriate remedial action will always depend on the circumstances of the individual case, but could include, for example:

- Disciplinary action such as dismissal, warning, transfer
- Remedial measures such as adjustment of risk management, processing of questionnaires by the supplier to clarify the facts, termination of the business relationship

Once the matter has been concluded, the whistleblower will be informed of the outcome of the investigation and any actions taken. The whistleblower will be informed of the status of the report no later than three months after receipt of the report, even if the investigation or processing has not yet been completed.

8 How is the whistleblower protected?

The BUHLMANN Group encourages an open dialogue and relies on information and reports from both Group employees and external parties to ensure and continuously improve the Group's responsible and human rights compliant business operations. Therefore, BUHLMANN Group will not tolerate any form of discrimination or retaliation based on information or complaints submitted. In order to protect the whistleblower from any form of retaliation, the BUHLMANN Group will, among other things, take the following measures:

- The group of people to whom information is passed on is kept as small as possible.
- Personal data that could reveal the identity of the whistleblower will be treated with the utmost confidentiality and will not be disclosed without the whistleblower's consent. This also applies after the complaint procedure has been completed.
- If a whistleblower, as an employee of a direct supplier, is subject to intimidation or reprisals, BUHLMANN Group will endeavour to work towards an end to this through appropriate contractual arrangements.

If it appears that retaliatory action has been taken against a whistleblower, BUHLMANN Group asks that this be reported through the above channels. BUHLMANN Group will investigate all allegations and take appropriate action if a violation has occurred.