

Compliance@Leistritz Guidelines for the Leistritz complaints procedure

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1. Purpose

In our Leistritz Business Code of Conduct, the Leistritz Group has committed itself to acting responsibly and lawfully. The principles laid down therein form the basis for our business activities.

Inappropriate behavior that contradicts these principles may damage the commitment and reputation of the Leistritz Group as well as the trust our business partners have gained in our group of companies as a result. Leistritz has therefore established a complaints procedure to identify any risks and violations

- against applicable law or our internal rules, and in particular
- in connection with human rights and the environment,

related to our business activities as early as possible, and to eliminate or minimize them as far as possible.

The guidelines for the Leistritz complaints procedure ensures that complaints are processed in a uniform manner. The guidelines govern in particular:

- the principles and the procedure according to which complaints are handled in the Leistritz Group,
- the responsibilities for implementing the complaints procedure within the Leistritz Group, and
- the rights of the parties involved.

2. Scope

This Policy applies to all complaints, including anonymous complaints, provided by one or more persons ("Reporting Person(s)") regarding the above-mentioned risks and violations caused by the business activities of Leistritz AG, its subsidiaries and its employees (collectively "Leistritz") or any of its direct or indirect suppliers.

3. Terms and Definitions

Terms	Definitions
Complaint	A notification received by Leistritz via the Leistritz complaints portal or other reporting channels as set forth in Sec. 4.1.
Leistritz complaints portal	The portal managed by Leistritz where complaints are received on an anonymous and/or confidential basis.
Conflict	If a person is the subject of a complaint, has a personal or other non-professional relationship with the person against whom the complaint is made, or would not be able to respond impartially or without the appearance of bias.
Responsible Specialist	The responsible person in whose department a complaint falls.
Reporting Person	One or more natural person(s) reporting a complaint related to Leistritz or its supply chain

4. Requirement and Procedure/ Proceeding

4.1. Reporting channels

Reporting Persons can submit complaints or reports in German or English via the following reporting channels:

- Via the electronic Leistritz reporting portal on our website at: [Compliance - Unternehmen - Leistritz AG](#)
- By e-Mail to: compliance@leistritz.com
- Leistritz employees can also contact their respective Compliance Officer directly.

4.2. Procedure

- **Receipt of complaints**

Die receipt of complaints or information via the reporting channels described above is documented internally and confirmed to the reporting Person within 7 days.

- **Preliminary examination**

Each report is checked by the complaints office for plausibility and admissibility of the complaints procedure.

If further information is required for an appropriate review or if further questions arise regarding the clarification of the facts in the ongoing procedure, the complaints office will contact the Reporting Person.

If establishment of contact is

- o not possible and the information provided is not sufficient for an investigation or
- o the information received does not fall within the scope of this procedure,

the procedure will be terminated, and the Reporting Person will be informed as far as possible.

- **Determining the facts of the case**

The complaints office categorizes the information and forwards it to the Responsible Specialist. The latter examines the facts of the case comprehensively, which includes obtaining of background information, analyzing documents and data, or conducting interviews with those involved or the Reporting Person.

The Responsible Specialist composes a report on the investigation for the complaints office. If, based on the report, there is no risk or violation of applicable law or internal rules and no human rights or environmental risks, the procedure is terminated, and the Reporting Person is informed accordingly.

- **Development and implementation of remedial measures**

The primary goal of Leistritz is to remedy an identified violation or risk as quickly as possible and to develop a solution together with those affected. If the investigation determines

- o a violation by Leistritz of applicable law or Leistritz internal regulations
- o a human rights or environmental risk or
- o a violation of human rights or environmental obligations by Leistritz or its supply chain,

Leistritz will take appropriate preventive measures and, if necessary, appropriate remedial measures. Any violation of internal and legal rules will be punished regardless of the position of the parties involved, including criminal prosecution if necessary.

Reporting Persons will be informed of the conclusion of the complaints procedure and its outcome.

- **Follow-up**

After completion of the procedure, Leistritz will follow up on the implementation of the remedial measures. The results such measures are evaluated. This may take place in exchange with the respective Reporting Person.

5. Principles of the procedure

5.1. Integer investigation

The Complaints Office and the persons responsible for the matter shall ensure that the investigation is conducted respectfully, thoroughly, impartially and, depending on the circumstances, swiftly, and that feedback is provided to the Reporting Person. The rights of the persons concerned and employees, including confidentiality ('need to know') and data protection, must be always safeguarded.

5.2. Conflict

If a person involved in the procedure is the subject of a complaint, has a personal or other non-professional relationship with the person against whom the complaint is directed, or would not be able to process the complaint impartially or without the impression of bias, then this person will be excluded from the procedure in question.

If, for example, a member of the complaints office is affected, the other members will process this complaint to the exclusion of the biased person. If a Responsible Specialist is biased, the complaint will be forwarded to an alternative person responsible for processing.

5.3. No retaliation

Leistritz does not tolerate any discrimination against employees who report possible or actual violations in good faith or who support investigations carried out in response to complaints. Leistritz guarantees the protection of the Reporting Person and those involved in the clarification of the facts against retaliation. This also applies if the complaint proves to be unfounded.

5.4. Transparency

Leistritz will publish an annual report on the company website in which an account is given of the number of reports received on human rights and environmental risks or breaches of duty.

6. Revision History

Version	Reason for modification	Date
V1.0	Creation	01.01.2024