

Rules of Procedure of the Mubea-Grievance System pursuant to Section 8 (2) of the Act on Corporate Due Diligence Obligations in Supply Chains ("LKSG")

In accordance with the requirements of the LKSG, we offer the possibility to report human rights- and environmental related risks as well as violations of human rights related or environmental obligations that have arisen from the economic activities of Muhr und Bender KG and its direct and indirect subsidiaries ("Mubea Group") in its own business organization or of a direct supplier of Mubea Group through a web-based grievance system.

Submitting a report is possible anytime and free of charge. In addition to submitting a written report by means of a questionnaire, you can also submit a report by an audio message. For this purpose, you can use a sound clip application, where you can record a message. In order to ensure your anonymity, your voice is distorted accordingly in the audio file created. All information provided to us can be submitted anonymously if you wish and if so selected in the submission process.

In order to be able to process possible reports appropriately, we would like to ask you to create and use a secure and protected mailbox on this platform, through which we can discuss the facts with you, if necessary. For this purpose, you will receive a case ID after submitting the report and can log in to your secure mailbox with a password created by yourself. In order to process the information effectively, we depend on your assistance and would like to ask you to regularly check the contents of the mailbox.

Once we have received a report, we will contact you in a timely manner. The persons entrusted by the Mubea Group with the implementation of the procedure ensure impartial action. They are independent and obligated to confidentiality and not bound by instructions with regard to the processing of the reports.

Below you can find further information on the processing of your report:

What happens after a report has been received?

After you have submitted a report regarding a human rights- or environmental related risk or violation, you will receive an acknowledgement of receipt immediately, but no later than seven days after receipt of the report. Abusive reports will, however, not be investigated.

What procedural steps will follow?

After receipt of a report, it is first checked for plausibility by the responsible case manager. In particular, case managers check whether the report falls within the scope of the LKSG. If this is not the case, you will receive a corresponding notification. Once this validation has been completed and in case there are any open questions, the case manager will discuss the facts with you. Therefore, it is of particular importance that you remember the case ID and your personal password for the protected mailbox. If the case takes longer to process, we will inform you of the current status of the case or the outcome of the investigation no later than three months after the report was submitted.

Who processes the notices?

The legal department of the Mubea Group is responsible for the complaint procedure and case processing.

Confidentiality and data protection

All information, documents and files provided to us in the report will be treated confidential and in compliance with the relevant data protection laws and other legal provisions. Without your express consent, your identity will not be disclosed to any person other than to the employees responsible for the complaint procedure. This also applies to all other information from which your identity can be directly or indirectly deduced.

In the course of investigations, other employees will only be involved if this is necessary for clarification.

Investigations

Investigations conducted on the basis of reports are carried out objectively and impartially. The presumption of innocence applies to accused persons. All investigative measures must be suitable, necessary and appropriate.

Protection against discrimination

Protection against disadvantage and punishment of the reporting person is particularly important for the effectiveness of this Grievance System. All reporting persons are protected accordingly against retaliation and punishment by the Mubea Group. Punishment covers direct reactions to a report (e.g. warning or dismissal), while retaliation covers consequences that have a causal link to the report (e.g. discrimination or denial of promotion).

Disclosure by the reporting person of the subject matter of the report to third parties or disclosure of the reporting person's identity without the consent of the Mubea Group is not permitted. This would lead to a loss of protection against retaliation or punishment. Protection will also not be granted in case of abusive reports. Employees who knowingly or negligently provide false reports may be subject to consequences under labor law and, if applicable, claims for damages. Furthermore, there is no protection against prosecution by the state.