



**KRONE**

**Complaints procedure**

**Rules of procedure**

**according to § 8 para. 2 LKSG  
(Supply Chain Due Diligence Act)**



## Establishment and purpose

Despite great efforts, even a mature compliance system cannot prevent individuals from breaking the rules.

If violations occur, both employees and external third parties have the option of contacting the designated compliance contact persons directly or contacting our ombudsman anonymously.

The contact details can be found on our website (Complaints Office).

The complaints procedure enables persons to point out, among other things, human rights and environment-related risks as well as violations of human rights-related or environment-related obligations which have arisen as a result of the economic actions of a company in its own business sector or of a direct or indirect supplier.

## Complaints procedure

The Complaints Office receives the complaint and, if required, discusses the facts of the case with the whistleblower. In each case, the whistleblower will receive an acknowledgement of receipt.

The Complaints Office examines whether there may be a breach of duty within the meaning of the Supply Chain Due Diligence Act (LkSG) or a breach of other laws or internal rules. If the ombudsman has received the tip-off and there are sufficient indications, he will pass on the facts submitted to him in an admissible form to the company for investigation. The ombudsman does not conduct an investigation himself so as not to jeopardise his neutrality.

The company follows up on the tip-off in compliance with the law and internal regulations and in consideration of the interests of all parties involved. The investigation should be carried out quickly and without major interruptions.

Persons affected by an investigation must be treated fairly and with respect. The presumption of innocence applies to all those concerned. The right to be heard must be granted. Therefore, the persons affected by a tip-off are informed as soon as possible about the tip-off received and advised of their rights to information and rectification. However, where there is a serious risk that notification would jeopardise the investigation of the tip-off, notification may be delayed until after the investigation has been completed or until the risk has ceased to exist.

The legal assessment of the facts under investigation and the determination of appropriate measures to eliminate and prevent improper business practices are carried out by the company. Measures may include, for example, appropriate civil action or



the involvement of an authority. Even if no violations are identified in a specific case, proposals for changes to work and business processes as well as changes to organisational regulations and codes of conduct may be indicated.

The whistleblower can obtain information on the facts of the case from the Complaints Office at any time. The whistleblower will receive feedback on the follow-up to the report three months after receipt of the report. At the latest on completion of the process, the ombudsman will inform the whistleblower of the results to the extent permitted by law.

## **Protection of the whistleblower**

The whistleblower is in principle protected from discriminatory or disciplinary measures. Any act of retaliation against the whistleblower will not be tolerated. If there is evidence of retaliation against whistleblowers, the Complaints Office must be called in immediately.

If the ombudsman has assured a whistleblower of confidentiality, he will not disclose the name and identity of the whistleblower to the company or any third party without the whistleblower's consent. Should the ombudsman be called as a witness in criminal, civil or other proceedings, he will only disclose the name and identity of the whistleblower if he is permitted to do so in writing by both the whistleblower and the company.

The wish of the whistleblower to protect his or her identity is opposed by the interest of the persons affected by the whistleblowing in the disclosure of the facts of the case. This is another reason why deliberate abuse of the opportunity to submit complaints and tip-offs will not be tolerated. The ombudsman should inform the whistleblower in the first interview that in case of deliberate abuse of the complaints procedure, his/her identity may be disclosed to the company.



## **Protection of our employees**

Confidentiality and data protection are always ensured in every contact. Our internal whistleblowing policy sets out the complaints procedure if our employees make a tip-off. It ensures that employees who report a suspected violation to the best of their knowledge and belief do not suffer any disadvantages.

## **Data protection**

The Complaints Office ensures compliance with the mandatory statutory retention periods and the data protection regulations. The personal data collected is limited to information on the identity, function and contact details of the whistleblower and the person concerned, as well as other personal data which is essential for processing the facts of the case. In addition, only reported facts, processing details, follow-up of the report and inspection reports will be saved.

For personal data recorded in the course of tip-offs and investigations, the retention period is two months after completion of the investigations. This period will be extended accordingly if the conclusion of the investigation is followed by disciplinary or judicial proceedings or other disputes for which the data must be used.

## **Effectiveness of the complaints procedure**

The effectiveness of the complaints procedure is reviewed once a year as well as on an ad hoc basis, for example if the company has to expect a significantly modified or significantly expanded risk situation in its own business area or at the direct supplier, for example due to the introduction of new products, projects or a new business field.