

# **Complaints mechanism**

## **ROVEMA GmbH**

### **Rules of procedure for whistleblowers**

## Preamble

The expectations regarding respect for and compliance with human rights and environmental due diligence obligations are part of the Rovema Principles for a Future Worth Living. They are aimed at all Group companies and employees. In addition, our company expects all suppliers along the supply chain to adhere to these principles and fulfil the requirements set out in our [Rovema Business Partner Code of Ethics](#).

We respect and comply with all applicable laws, regulations, our internal policies and guidelines. We ensure that we understand all relevant laws and regulations before engaging in business activities, comply with their principles and ensure through our actions that we do not inadvertently violate these laws. This is stated in our [Rovema Code of Ethics](#).

Standardised processes and professional handling of reports and complaints by internal persons with expertise are the basis for a transparent complaints procedure. The complaints procedure described here supports Rovema in recognising possible violations of human rights and environmental due diligence obligations at an early stage and initiating the necessary countermeasures to remedy them.

The most important information on the complaints procedure is presented below.

### 1. What information and complaints can the procedure be used for?

Information on human rights or environmental risks and information on violations of human rights or environmental due diligence obligations can be reported. The information or complaints may concern Rovema's own business area, the supply chain or other Rovema business partners.

The human rights and environmental protection positions include (but are not limited to):

- Respect for human dignity,
- Rejection of child labour,
- Rejection of forced labour,
- Humane treatment, anti-discrimination and diversity,
- Ensuring health and safety at work,
- Right to organise and collective bargaining,
- Fair working conditions and remuneration,
- Equal opportunities for career development,
- Protection of soil, water, air, biodiversity and cultural assets,
- Reduction of environmental pollution and conservation of resources,
- Safe handling of hazardous substances,
- Responsible handling of wastewater and solid waste,
- Prevention and emergency preparedness.

## 2. Who can use the complaints procedure?

Any person who observes or perceives human rights or environmental risks or violations of human rights or environmental due diligence obligations can submit information or complaints. The person does not have to be personally affected. Both internal and external Rovema employees can submit reports.

Rovema expressly encourages all employees and trainees, interns and work-study students to submit reports - as well as employees of Rovema's direct and indirect suppliers and business partners.

The whistleblower does not incur any costs when using the complaints procedure.

## 3. How is the whistleblower protected?

Rovema does not tolerate any pressure, coercion or reprisals against whistleblowers and intermediaries, but also all other persons who contribute to promoting compliant behaviour. Any whistleblower who does not intentionally or grossly negligently report false information will be protected from reprisals of any kind that can be traced back - even if only indirectly - to the whistleblowing or complaint, insofar as this is legally possible for Rovema.

The identity of the person providing the information or any information that allows conclusions to be drawn about their identity (e.g. age, gender, etc.) will always be treated confidentially and will not be disclosed at any time, unless the information must be disclosed due to legal regulations (e.g. in connection with an investigation or criminal proceedings). Furthermore, all information or complaints received and the information contained therein will be treated confidentially. Rovema shall at all times minimise the number of persons who gain comprehensive knowledge of and access to the confidential information.

If desired, the person providing the information can also do so anonymously. In this case, Rovema will not take any measures to determine the identity of the whistleblower. If it is possible to draw conclusions about the identity of the person providing the information based on the content of the information, Rovema will treat this information confidentially.

The principles of the General Data Protection Regulation and the Federal Data Protection Act will be observed. Information on the handling of personal data is summarised in our [data protection information on the Rovema whistleblowing system](#).

## 4. Which contact options can be used to submit information and complaints?

Rovema has various internal and external channels for the submission of complaints, information or notices.

### 4.1. SpeakUp®-Portal

The [SpeakUp portal](#), Rovema's electronic, multilingual whistleblowing system, is available to all whistleblowers. Reports and complaints can be submitted anonymously around the clock. Communication with the reporting person is also possible anonymously via a mailbox.

## 4.2. By post

Reports and complaints can also be submitted to Rovema Compliance by post or by internal mail:

Rovema GmbH  
Compliance  
Industriestr. 1  
35463 Fernwald

or by e-mail to: [compliance@rovema.de](mailto:compliance@rovema.de).

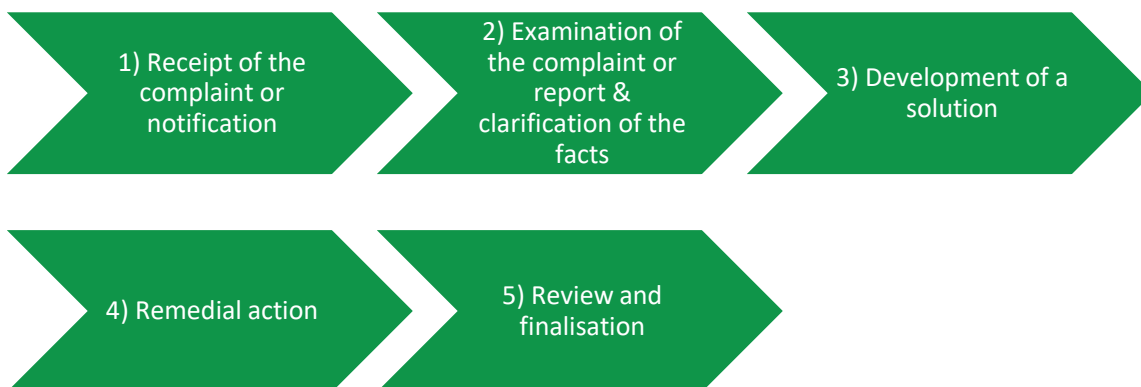
## 4.3. In person

If a personal meeting is desired, an appointment can be arranged in advance via [compliance@rovema.de](mailto:compliance@rovema.de). In this way it can be ensured that a Rovema compliance officer is available for a personal meeting.

## 4.4. Rovema employees

Rovema employees can turn to several contact persons at any time if they are unsure or wish to report a problem. An overview of all (also anonymous) reporting options is available on the Rovema intranet, including the respective contact and access details.

## 5. How does the complaints procedure work?



### 5.1. Receipt of the complaint or notification

Receipt is confirmed and documented to the person providing the information.

### 5.2. Examination of the complaint or tip-off and clarification of the facts

The complaint or tip-off is examined by the internal Rovema compliance experts. These employees act impartially. They are trained to carry out this activity and are not bound by instructions.

If the information or complaint is plausible and there is an initial suspicion of potential human rights or environmental risks or violations of human rights or environmental aspects, an appropriate investigation of the case follows and the further procedure and responsibilities are determined.

If the justification is not sufficient, contact is made - where possible - with the whistleblower so that additional information can be provided by the whistleblower if necessary.

If the additional information does not lead to a better understanding, the procedure is discontinued and the parties involved are informed. In the event of a rejection, the whistleblower will receive a statement of reasons.

If the reported facts do not fall within the scope of the Supply Chain Due Diligence Act, the whistleblower will also be informed.

### **5.3. Development of a solution**

In dialogue with the whistleblower, a proposal for remedial action is developed based on the clarification of the facts. If necessary, agreements on compensation are also reached.

### **5.4. Remedial measures**

The agreed remedial measures are implemented and followed up.

### **5.5. Review and conclusion**

At the conclusion of the case, a summarised report is drawn up with the results of the investigation of the case. The effectiveness of the corrective measure(s) will be followed up and the protection of the whistleblower against reprisals will be monitored wherever possible.

Where necessary and possible, contact will be maintained with the whistleblower at this stage.

## **6. Effectiveness review**

The effectiveness of the procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments are made to the procedure or the corrective measures that have been taken.