

## **Code of procedure for the ARI-Armaturen reporting of potential violations**

### **I. Establishment and purpose of the reporting system**

The reporting system of ARI-Armaturen enables the submission of remarks and complaints. These rules of procedure define the conditions and the course of the procedure and are published according to due diligence laws. The reporting system enables persons to point out human rights and environment-related risks as well as violations of human rights or environment-related obligations that have arisen due to the economic actions of a company in its own business area or a direct supplier.

### **II. Contact data**

For the reporting system, an external attorney of trust (Ombudsman) is available under the following contact data:

Dr. Carsten Thiel von Herff, LL.M.  
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The ombudsman is an independent neutral person and independent lawyer. All matters are handled impartially. In doing so, the ombudsman is not subject to any content-related instructions by our company. The ombudsman is bound to secrecy. If requested, he will maintain the confidentiality of the identity of a person providing information.

### **III. Process**

The ombudsman receives the complaint and, if necessary, reconsiders the facts with the person providing the information. In any case, the person providing the information will receive an acknowledgement of receipt.

The ombudsman examines whether there may be a breach of any laws including due diligence laws or a violation of another statutory or internal rule. If there are sufficient indications, he will pass on the facts to us for investigation in an admissible or desired form. The ombudsman does not conduct an investigation himself in order to not risk his neutrality.

We investigate the matter in compliance with applicable laws and our internal rules, taking into account the interests of all parties involved. The investigation is to be conducted as uninterruptedly as practicable.

Respectful and fair treatment of all persons concerned is an important principle. The presumption of innocence applies to all persons concerned. The right to be heard must be granted. For this reason, the persons affected by a report are informed as soon as possible about the report received and made aware of their rights to information and rectification. However, if there is a serious risk that notification would jeopardize the investigation of the report, notification may be postponed until after the investigation has been completed or until the risk has ceased to exist.

Die hinweisgebende Person kann sich jederzeit beim Ombudsmann über den Sachstand informieren. Sie erhält drei Monate nach Meldungseingang eine Rückmeldung über die Folgemaßnahmen zu der Meldung. Spätestens nach Abschluss des Vorgangs wird sie durch den Ombudsmann im Rahmen des rechtlich Zulässigen über das Ergebnis unterrichtet.

The legal assessment of the facts under investigation and the determination of appropriate measures to eliminate and prevent improper practices are carried out by us, and we may involve the ombudsman for this purpose. This may include, for example, appropriate legal measures or the involvement of an

authority. Even if no violations are found in a specific case, we will consider proposals for changes to work and business processes as well as changes to organizational and behavioral rules.

The person making the report can contact the ombudsman at any time to request the status of the case. Three months after receipt of the report, he or she will receive feedback on the follow-up measures to the report. The ombudsman will inform him or her of the outcome of the case to the extent permitted by law, at the latest after the case has been closed.

#### IV. Protection of persons making a report

The person making a report is generally protected from discriminatory or disciplinary sanctions. Any retaliatory action directed against them will not be tolerated. If there is evidence of retaliation against persons who made a report, the ombudsman must be contacted immediately.

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

The request of the person providing the information for protection of his or her identity is opposed by the interest of the persons affected by the information in the disclosure of the facts. Inter alia for this reason willful abuse of the opportunity to submit complaints and reports will not be tolerated. The ombudsman should point out to the person providing the report in the first conversation that in the event of willful misuse of the reporting system, his or her identity may be disclosed to the company.

#### V. Data protection

The ombudsman ensures compliance with the statutory retention periods and other provisions of data protection law. The personal data collected is limited to details of the identity, function and contact information of the persons making the report and of the persons concerned, as well as to the other personal data that is absolutely necessary for processing the matter. In addition, only reported facts, processing details, follow-up on the report and audit reports are stored.

The retention period for personal data recorded in the course of reports and investigations is two months after completion of the investigations. This period is extended accordingly if the conclusion of the investigation is followed by disciplinary or legal proceedings or other disputes for which the data must be used.

The data protection officer checks the data protection conformity of the complaint procedure on a regular basis.

#### VI. Effectiveness

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis, for example if the company anticipates a significantly changed or significantly expanded risk situation in its own business area or with its direct supplier, for example as a result of the introduction of new products, projects or a new business area.