

**Rules of procedure for the appeal proceedings  
according to § 8 LkSG**

**4.3**

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## Rules of procedure for the appeal proceedings according to § 8 LkSG

### 4.3

#### 1. Purpose

The German Act on Corporate Due Diligence to prevent human rights violations in supply chains (LkSG), which came into force on 1 January 2023, aims to protect human rights and the environment in the global economy.

In order to fulfil these objectives, we have set up an effective appeal procedure in accordance to § 8 LkSG. The aim is to prevent violations of the LkSG or to detect them at an early stage in order to avoid possible negative consequences for those affected.

Business partners, customers and other third parties can use the appeal procedure to report violations of human rights and environmental obligations and the associated risks, anonymously if desired.

The human rights obligations include the prohibition of child labour, protection against slavery and the prohibition of disregarding occupational health and safety. Environmental aspects include, on the one hand, substances that pose a risk to people and the environment and, on the other, actions or circumstances that may lead to violations of human rights.

In the following, we have described the reporting channels, the responsibilities and the exact procedure for reporting by means of a procedural regulation.

#### 2. Scope of application

All companies in the Group.

#### 3. Terms

Terms	Explanation
LkSG	Supply Chain Due Diligence Act (Lieferkettenschutzgesetz)
HinSchG	Whistleblower Protection Act (Hinweisgeberschutzgesetz)

#### 4. Responsibility

In order to guarantee the maximum protection for whistleblowers and those affected, we have established an independent reporting office, the atarax group of companies.

#### 5. Description

In the following, we would like to explain the exact reporting procedure.

a) Receipt of the report

Upon receipt of the report, the reporting person will receive a confirmation of receipt from the reporting office in due time. This also applies in the case of an anonymous report by mail, provided that a reporting channel intended for the submission of anonymous reports, e.g. via a third party (lawyer or authorised person) is used or another anonymous contact option is available.

b) Examination, clarification of facts and remedial measures

The report is then carefully checked for plausibility. If further information is required, the reporting office will, if possible, contact the reporting person in order to obtain further information.

If there are concrete indications of a violation, an internal investigation and possibly further appropriate follow-up or remedial measures (e.g. improvement of internal processes) may be initiated.

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The information is processed as part of a fair and confidential process, in particular with regard to the identity of the person providing the information, and in compliance with data protection law. Furthermore, the principle of proportionality is observed.

Discrimination or penalisation of the whistleblower based on a complaint about an actual or suspected violation will not be tolerated. To this end, we have set up an independent reporting office and the option of submitting a report anonymously.

If possible, contact is maintained with the whistleblowers in accordance with the relevant legal requirements and the facts of the case are discussed if necessary. In addition, the whistleblowers are informed of the progress of the proceedings in a timely manner.

Information provided will only be passed on to those persons who must be involved in the processing of the report, insofar as this is absolutely necessary to determine the facts of the case.

All information received will be documented, stored and deleted in accordance with the legal provisions.

c) Effectiveness monitoring

Our appeal procedure is regularly reviewed with regard to its effectiveness and improved where necessary.

### Communication Channels

The following communication channels are available to ensure complete confidentiality:

<u>Telefon</u>	Whistleblowing hotline: 0049 / 160 / 96210839 (Monday - Friday from 08.30 - 17.00, except on public holidays)
<u>E-Mail</u>	E-Mail to: <a href="mailto:compliance@atarax.de">compliance@atarax.de</a>
<u>Whistleblower portal</u>	Whistleblower portal with contact form: <a href="https://www.atarax.de/de/startseite/leistungen/hinweisgeberportal">https://www.atarax.de/de/startseite/leistungen/hinweisgeberportal</a> The link will redirect you to the whistleblower portal of the atarax group of companies. Of course, this forwarding will not be traced back.
<u>By mail</u>	Written notification by mail to: atarax Unternehmensgruppe, Luitpold-Maier-Str. 7, D-91074 Herzogenaurach
<u>Face-to-face</u>	At the whistleblower's request, a report can also be made in a confidential personal face-to-face meeting within a reasonable period of time.
<u>Digital</u>	Digital whistleblower system at <a href="https://wiegel.hintbox.eu">https://wiegel.hintbox.eu</a>

## **6. Documentation**

The company atarax is responsible for the documentation of the complaint tracking.

## **7. Applicable documents/Attachments**

### 7.1 Applicable documents

Not applicable

### 7.2 Attachments

Annex 34 List of participating companies