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# Rules of procedure

Information on handeling complaints about violations within the supply chain

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#### Who can report what?

All employees, our business partners (customers and suppliers) as well as other persons are entitled to submit complaints and tips with regard to human rights and environmental risks as well as violations of human rights-related or environmental obligations that have arisen as a result of the economic activities of our company in its own business area or of a direct supplier.

For other complaints and tips, please use the contact options as mentioned and offered at https://integrity.wieland.com.

#### How can I report?

The whistleblower system can be reached both internally and externally: via the Internet (https://integrity.wieland.com) and by telephone (Germany: +49 731 944 1222 | North America: +1 502 873 3025 | Austria: +43 7472 606 535 | All other countries: +49 731 944 1244 | your telephone provider may charge for a call as agreed with you). In addition, we are also available for a personal conversation. In this case, please contact us by e-mail at compliance@wieland.com to arrange an appointment.

#### Is confidentiality ensured?

All parties involved in the processing of your complaint are bound to confidentiality. Your identity will not be disclosed - without your consent - beyond the circle of those involved in the proceedings, unless we are obligated to do so (exceptions may apply in particular in the case of official investigations, in administrative or court proceedings, and due to data protection regulations). Therefore, you can of course submit your complaint anonymously by not providing any personal information that would allow us to identify you.

We do not, of course, penalize or discriminate against anyone on the basis of a complaint or tip-off.



#### Who processes my tip or complaint?

Complaints and tips are received by the Group Compliance Officer. An initial impartial plausibility check takes place there. Apart from the Group Compliance Officer, only the Compliance Team, which is also bound to confidentiality, has access to the complaint or tip.

Further assessment and processing of the hint is carried out – also impartially - by the Supplier Risk Committee (hereinafter referred to as SRC), a committee made up of managers from the relevant specialist areas (Global Procurement, Metals Management, HR & Human Rights Officer, Sustainability, Compliance), which has Group-wide responsibility for supply chain management issues. In doing so, the SRC can involve relevant departments and delegate individual steps of the investigation as well as the setting of measures. At this point, too, those involved in the process are bound by the duty of confidentiality.

#### How does the processing take place?

We will inform you immediately, at the latest within seven days, after receipt of your tip or complaint about the successful transmission, provided that you have provided us with an appropriate means of contact (e.g. telephone number, e-mail address, postal address, anonymous mailbox of the whistleblower portal).

Based on your tip or complaint, an ad hoc analysis of the facts will take place, using the criteria of our supplier screening process as a basis.

Where necessary, we also involve other stakeholders in this process. If you have offered us an opportunity to contact you, we will also discuss the facts with you.

Based on the outcome of the discussion and review, we implement further measures from our defined portfolio of measures (e.g. supplier development, supplier audit, extended contractual agreements, temporary or complete suspension of the supply relationship) or terminate the screening process if there is no need for action (e.g. because there is no infringement as defined by the German Supply Chain Act (LkSG) or we have no relevant influence). The SRC decides on this by majority vote after assessing the factual and legal situation and after hearing any affected stakeholders and discussing the matter with you.



#### Will I be informed about the result?

As a rule, we will inform you about the result within three months, provided that you have provided us with an appropriate means of contact.

#### Can I stay in contact even if I report anonymously?

Yes, we will set up an anonymous mailbox for you if you submit your complaint / whistleblower online via our whistleblower portal (https:// integrity.wieland.com). You will receive the access data (login and password) immediately after submitting your tip.

Alternatively, you are welcome to use an (anonymous) e-mail address (e.g., if you would like to use the voice recording option or contact us by telephone).

#### Further questions?

We are happy to help – please contact us at compliance@wieland.com



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