

# Rules of Procedure

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on the Complaints Procedure in the Event of Violations of the Act on Corporate Due Diligence  
Obligations for the Prevention of Human Rights Violations in Supply Chains (LkSG)

## 1. Purpose and scope of application

### 1.1 Purpose

The purpose of these Rules of Procedure is to provide a transparent presentation of the company's own complaints procedure in accordance with Section 8 (2) of the LkSG of Strama-MPS Maschinenbau GmbH & Co. KG, AuE Kassel GmbH and F & K DELVOTEC Bondtechnik GmbH (hereinafter referred to as "the companies"). The purpose of the complaint procedure is to enable persons to point out human rights and environmental risks as well as violations of human rights-related or environmental due diligence obligations under the LkSG that have arisen as a result of the companies' economic activities in their own business area or as a result of the actions of a supplier.

### 1.2 Anwendungsbereich

The complaints procedure applies to the following parties:

- External employees, e.g. temporary workers, employees of external service providers
- Business partners, e.g. suppliers, customers or cooperation partners
- Internal whistleblowers
- Other third parties

## 2. Description of the complaint procedure

Whistleblowers can file a complaint on an internet-based system, accessible via the following links:

Strama-MPS Maschinenbau GmbH & Co. KG <https://strama.strama-group-hinweise.com/>

AuE Kassel GmbH <https://aue.strama-group-hinweise.com/>

F & K DELVOTEC Bondtechnik GmbH <https://fkd.strama-group-hinweise.com/>

The system is available in German and English. Complaints can be filed in writing or audio recordings. Certain file types may also be optionally uploaded.

After sending the complaint, the responsible persons within the companies will be informed about the new complaint. The system is run by the chief organisation (Strama-MPS Maschinenbau GmbH & Co. KG).

Each complaint will be carefully reviewed by the team. The team members work independently and impartially to clarify the facts. The investigation is conducted confidentially. Team members may conduct confidential discussions with employees, contractors or other persons they consider relevant for the investigation.

The companies will confirm receipt of a complaint within seven days.

After all findings of the investigation have been reviewed, a decision will be made as to whether a violation has occurred. If so, corrective action will be taken. The whistleblower will be notified 3 months after the confirmation of receipt at the latest.

### **3. Confidentiality and protection against disadvantages**

The companies are committed to maintaining confidentiality and protecting whistleblowers against disadvantages.

Whistleblowers who submit complaints concerning possible compliance violations and provide information about human rights and environmental risks as well as violations of human rights-related or environmental due diligence obligations to the best of their knowledge and in good faith do not have to fear any adverse results for themselves. The companies reserve the right to take legal action or disciplinary measures against whistleblowers in the event of misuse of the whistleblowing system.

### **4. Review and improvement of the complaint procedure**

The companies will conduct annual and continuous improvements of the complaint procedure.