



Whistleblower Policy



Effective date: December 15, 2023
Version 1.0

1. Summary	3
2. Scope	3
3. Scope of application	3
4. Responsibility	4
5. Come into effect	4
6. Complaint channel	4
7. Course of the procedure	5
7.1. Receipt of the report	5
7.2. Checking the message	5
7.3. Clarify the matter	5
7.4. Developing a solution	5
7.5. Remedial measures	5
7.6. Review and completion	5
7.7. Process and result of the procedure.	6
8. Amicable dispute resolution	6
9. Protection of the person providing the information from discrimination or punishment	6
10. Effectiveness control and further development of the process	6
11. Confidentiality and data protection	7
12. IT and data security	7
13. Extinguishing concept	7
14. Attachments	7
15. Change history	8

1. Summary

Our complaint process is designed to allow people to report if they identify actual or potential human or environmental rights issues. These can be problems in our supply chains, but also in our own business area. These rules of procedure describe which topics reports can relate to, how they can be submitted and what happens after a report has been submitted.

We will be happy to answer any questions about the process, either directly via the reporting system or via the contact option under “Responsibility for the complaints procedure”.

2. Scope

This policy applies worldwide to all members of the Board of Executives , managers, employees, trainees and interns in all locations and to all representatives of the company, including consultants and representatives.

3. Scope of application

These procedural rules regulate the handling of reports and complaints in accordance with the German Supply Chain Due Diligence Act (LkSG) at Felix Schoeller. The complaint process is available for information and complaints about human rights and environmental risks regulated in Section 2 Paragraph 2 and 3 LkSG, as well as in cases of violation of human rights-related or environmental obligations in accordance with Section 3 Paragraph 1 LkSG.

Specific examples:

Human rights violations:

- Child labor
- Forced labor and slavery
- Discrimination and unequal treatment
- Disregard for freedom of association
- Denial of a fair wage
- Working conditions that are hazardous to health
- Data protection violations
- Unlawful evictions or the unlawful deprivation of land
- Unlawful use of private or public security forces
- Contamination of water, soil and air that can contribute to human rights violations

Environmental law violations:

- Use of mercury (according to Minamata Convention)
- Use of persistent organic pollutants (according to the Stockholm Convention)
- Non-environmentally sound storage, handling, import and export of hazardous waste (according to the Basel Convention)

4. Responsibility

Centrally responsible for our complaints procedure and primary contact person for questions or comments:

Ms. Mechtild Kerkhoff

Human Rights Officer and Compliance Officer from Felix Schoeller

Email: mkerkhoff@felix-schoeller.com

Telephone: +49 541 3800 321

Or in the case of representation:

Burkhard Neumann

Email: bneumann@felix-schoeller.com

Telephone: +49 541 3800 657

5. Come into effect

This policy comes into force on December 15, 2023.

6. Complaint channel

To detect possible violations, an external, electronic system operated by EQS (whistleblower system) has been set up on our website:

German: <https://www.felix-schoeller.com/Rechts/wissengebersystem>

English: <https://www.felix-schoeller.com/en/legal-notice/whistleblower-system>

French: <https://www.felix-schoeller.com/fr/conditions-generales/systeme-dalerte>



German



English French



External stakeholders, such as business partners and their employees or neighbors of our locations, have the opportunity to report suspected compliance cases to Felix Schoeller using this whistleblower system.

The use of the complaint channel is free of charge for the whistleblower.

7. Course of the procedure

Responsibility for the process and its implementation lies with Felix Schoeller's human rights officer or her representative.

7.1. Receipt of the report

Once the report has been received, those who provide information will receive a confirmation of receipt. This usually takes place within seven days of receipt of the report.

7.2. Checking the message

Once received, the content of the report is checked. In this phase, questions may arise that will be clarified in dialogue with the person providing the information. Depending on the content, the next steps will be determined. If the complaint is rejected, the person providing the information will receive a reason.

7.3. Clarify the matter

If the procedure continues, the issue will be discussed and examined with the person who provided the information. Optionally, a procedure for amicable dispute resolution may be available.

7.4. Developing a solution

A proposal for a solution is developed in close contact with the person who provided the information. If relevant, redress arrangements will be made.

7.5. Remedial measures

Remedial action may be required to resolve reported issues. If remedial actions have been agreed, these will be implemented and tracked.

7.6. Review and completion

The result of the procedure is evaluated together with the person who provided the information. In particular, it is about the satisfaction of the person providing the information with the result and the course of the procedure.

7.7. Process and result of the procedure.

The duration of the procedure depends on the circumstances of the case and can range from a few days and weeks to a few months. Basically, we strive to lead the process as efficiently as possible to a satisfactory solution. In addition, we always endeavor to keep the whistleblower informed about the measures taken and what will happen next. When using the digital reporting system, we recommend that whistleblowers log in regularly and check their own case for new messages.

8. Amicable dispute resolution

For some complaints, it may be advisable to involve a neutral, mediating third party. We would like to help find a satisfactory solution that can be supported by all parties. If it becomes apparent during the process that an amicable dispute resolution could make sense, we will endeavor to involve such a neutral party.

9. Protection of the person providing the information from discrimination or punishment

We generally work to ensure that people who provide information do not experience any disadvantage or punishment as a result of their report. We ensure this for internal whistleblowers. Retaliation based on complaints or tips will not be tolerated. If the reporting person is employed by our company, this includes protection against termination, demotion, suspension, threats, harassment or other forms of discrimination in relation to the terms and conditions of employment of an employee.

For example, if the reporting person is employed by a supplier, we work with the supplier to ensure that the person enjoys a comparable level of protection. In order to ensure that the whistleblower is not subjected to discrimination, punishment or similar retaliation, we will endeavor to contact the whistleblower beyond the conclusion of the proceedings. In this context, the proposed option of submitting complaints anonymously increases trust in the system and represents a further protective mechanism.

10. Effectiveness control and further development of the process

We take the results of our risk analysis and findings about potential target groups into account both with regard to the procedure as a whole and when processing reports themselves. We therefore review the effectiveness of the procedure described above

annually and as needed and, if necessary, make adjustments and changes regarding accessibility and the course of the complaint procedure. We also welcome suggestions and feedback from whistleblowers.

Furthermore, the knowledge gained from processing reports is incorporated into the adaptation of our own due diligence processes.

11. Confidentiality and data protection

All information, regardless of its veracity, is capable of greatly damaging the reputation of those affected, those providing the information and/or third parties, as well as the company. We will therefore treat you with particular confidentiality beyond the obligations arising from data protection laws. If third parties are involved in processing the notice, only the necessary information will be provided. In addition to the processing directory, which must be kept properly and always updated, it must be recorded in writing which persons are allowed to access the information and the associated data and what rights they have within the scope of data processing. These people must be obliged to maintain special confidentiality beyond any legal requirements.

12. IT and data security

The EQS Group's Integrity Line is used as an IT solution for receiving and processing reports. The selected solution ensures that the legal requirements with regard to IT security and data protection are met. The minimum requirements for the scope of the General Data Protection Regulation arise from Art. 32 GDPR, our regulations on IT security and data protection. The particular sensitivity of the notices and the risks to people and the company if notice-related data becomes known must be taken into account in a special way

13. Extinguishing concept

We only store personal data for as long as it is necessary to process the notice or for as long as we have a legitimate interest in storing your personal data. Storage can also take place if this has been provided for by European or national legislators in order to fulfill legal obligations, such as retention obligations. All personal data will then be deleted, blocked or anonymized by the human rights officer.

14. Attachments

No

15. Change history

Version overview	Date	comment	Surname
1.0	December 15, 2023	Creation of whistleblower guidelines	Neumann