

Rules of procedure for the complaints system

Münster, June 2024



Rules of procedure

1 Target

zeb is committed to acting responsibly and sustainably. This ambition, which is also directed at clients and suppliers, is documented in zeb's Code of Conduct. The establishment of a complaints procedure reflects this ambition and also fulfills a key requirement of the [German Supply Chain Due Diligence Act \(SCDDA\)](#).

If you notice or suspect a violation of the SCDDA, feel free to consult our summary of the complaints process below:

2 Subject

Potentially affected parties can use the procedure to raise concerns regarding violations of the contents and objectives of the SCDDA. This entails all human rights risks and breaches of duty that are covered by the SCDDA, namely:

- Child labor
- Slavery and forced labor
- Disregard for occupational safety and work-related health hazards
- Disregard for freedom of association and the right to collective bargaining
- Objectively unjustified unequal treatment in employment
- Withholding of appropriate wages
- Destruction of the natural basis of existence through environmental pollution
- Unlawful violation of territorial law
- Violation of the prohibition on hiring security personnel who may, for example, cause harm to life and limb due to lack of instruction or control

Moreover, the act covers environmental risks in connection with the improper emission of:

- mercury,
- persistent organic pollutants (POPs) or
- hazardous waste.

Reports pursuant to the German Whistleblower Protection Act (Hinweisgeberschutzgesetz) are not governed by these rules of procedure.

3 Principles

- We encourage you to report any suspicions of misconduct as soon as possible. We want you to know that your concerns will be taken seriously and investigated promptly and that confidentiality will be maintained at all times.
- We assure you that you can raise genuine concerns in good faith without fear of retaliation, even if your concerns turn out to be unfounded.
- Through our complaints system, we want to prevent potential damage and financial losses for zeb.

4 Group of people affected

Persons can be potentially affected due to:

- activities in zeb's proprietary business area,
- activities of zeb's direct or indirect suppliers,
- infringement of their protected legal position or
- knowledge of a possible violation of a protected legal position or a human rights or environment-related obligation,

and raise a concern.

5 zeb group

In addition to zeb.rolfes.schierenbeck.associates gmbh, Münster, zeb comprises the following companies:

- zeb.rolfes.schierenbeck.associates gmbh, Vienna
- zeb.rolfes.schierenbeck.associates gmbh, Zurich
- zeb.rolfes.schierenbeck.associates sp. z o.o., Warsaw
- zeb.rolfes.schierenbeck.associates TOV, Kyiv
- zeb.rolfes.schierenbeck.associates gmbh, Luxembourg

- zeb Consulting s.r.l., Milan
- zeb/rolfes.schierenbeck.associates s.r.l., Milan
- zeb.Consulting AB, Stockholm
- zeb.rolfes.schierenbeck.associates AS, Oslo
- zeb.rolfes.schierenbeck.associates Ltd., London
- zeb.rolfes.schierenbeck.associates B.V., Amsterdam
- zeb.move business coaching gmbh, Münster
- zeb.information.technology gmbh & co. kg, Münster
- zeb.information.technology gmbh, Münster
- findic gmbh, Münster
- findic gmbh, Zurich
- zeb.connect gmbh, Münster
- zeb.applied gmbh, Münster

6 Contact

The Legal Desk is the sole point of contact for persons raising a concern throughout the entire complaints procedure. In its function, the Legal Desk is independent and not bound by instructions and thus offers the guarantee of impartial action.

7 Contact options

People who want to raise a concern can submit their information via the following contact options:

E-mail:	speakup@zeb.de
Phone:	+49.251.97128.0
Letter:	zeb.rolfes.schierenbeck.associates gmbh Legal Desk Hammer Str. 165, 48153 Münster, Germany

8 Process

The complaints procedure includes the following steps:

8.1 Receipt

The Legal Desk examines the incoming information to determine whether an SCDDA violation has occurred.

8.2 Confirmation of receipt

The Legal Desk will confirm receipt of the information to the person(s) who raised the concern within five working days via the chosen contact channel (e-mail, telephone or letter). If a contact option is not specified (anonymous tip-off), zeb is not obliged to determine it. In such cases, there is no need to send a confirmation of receipt.

8.3 Rejection

If no SCDDA violation can be identified, the person(s) who raised the concern will receive reasoned feedback within ten working days of receipt of the information, provided there are no legal or official reasons speaking against it.

8.4 Clarification of the matter

If the concern falls within the scope of the SCDDA, the Legal Desk will begin to clarify the facts of the matter. For this purpose, further information can be requested from the person who raised the concern or the need for a discussion of the matter may arise in order to better understand the matter in detail.

If it transpires that a breach of the SCDDA-related obligations

- seems possible,
- is imminent or
- has occurred

in zeb's proprietary business area or in the business area of a direct or indirect supplier of zeb, the existing specific risk analysis must be updated immediately, or a specific risk analysis must be prepared.

Adequate preventive and/or remedial measures are initiated as a result of the specific risk analysis. The measures must be suitable for preventing the violation of protected legal positions or for minimizing or eliminating violations that have already occurred.

The clarification of the matter is completed within three months and is concluded with a statement to the person(s) who raised the concern.

9 Review of the effectiveness of the complaints procedure

The effectiveness of the complaints management system is reviewed by the Legal Desk on an ad hoc basis and at least once a year.

10 Documentation and storage

Every SCDDA complaint received is documented and retained in accordance with Section 10 SCDDA. Complaints that do not fall within the scope of the SCDDA may have different timelines for documentation and retention.

11 Confidentiality and anonymity

When a concern is received, zeb ensures that the confidentiality of the information and the identity of the person(s) raising the concern are protected by using suitable personnel, organizational and technical structures. It must be ensured that persons who raise concerns are protected from disadvantages and punishment. The employees entrusted with the complaints procedure are therefore obliged to maintain confidentiality and comply with data protection regulations.

Confidentiality and data protection relate to

- the person(s) raising a concern,
- the persons and contents that are the subject of the concern, and
- any other persons named or contents of the concern.

12 Costs of the procedure

Persons raising a concern do not incur any costs; the procedure is free of charge for them.