
Complaint Procedure Policy

of

Franz Morat Holding GmbH & Co. KG

Franz-Morat-Straße 6

79871 Eisenbach, Deutschland

Including its affiliated companies

This procedure policy informs about the complaint procedure of Franz Morat Holding GmbH & Co. KG. The complaint portal is part of our compliance with human rights, environmental, and other due diligence obligations. It allows for company-related reports or the submission of complaints.

The complaint procedure serves as an early warning system to identify human rights violations and environmental risks within our own business operations as well as in the direct and indirect supply chain. Furthermore, the procedure provides access to appropriate remedies for affected individuals when legal violations or damages have already occurred.

The specific topics on which reports and complaints can be submitted are explained further in this document

Submission of Complaints or Reports

Who can submit a complaint or a report?

- Own workforce
- Workers in the value chain (direct and indirect suppliers)
- Affected communities (including residents, among others)
- Consumers/End-users/Customers
- Any individuals whose data is collected or provided to us
- Other persons connected to the company

On what topics can complaints or reports be submitted?

1. Legal Violations and Irregularities

- Violations of the law
- Violations of the Code of Conduct
- Violations of internal regulations

2. Human Rights and Environmental Issues, Risks, and Violations in the Supply Chain

2.1 Environmental Reports (Supply Chain)

- Air, soil, or water pollution, and noise
- Improper handling of hazardous substances
- Illegal waste disposal
- Unauthorized release of substances that can cause permanent changes in the chemical or physical composition of water, soil, or air

2.2 Human Rights Reports (Supply Chain)

- Child labor
- Modern slavery or forced labor
- Violations of maximum working hours
- Violations of health and safety regulations at the workplace
- Disregard of freedom of association
- Unequal pay

3. Company-related ESG Topics

3.1 Environment (Environmental Reports)

- Air, soil, or water pollution, and noise
- Improper handling of hazardous substances
- Illegal waste disposal
- Unauthorized release of substances that can cause permanent changes in the chemical or physical composition of water, soil, or air

3.2 Social (Social Reports)

- Modern slavery or forced labor
- Violations of working hours
- Violations of health and safety regulations at the workplace
- Disregard of freedom of association
- Unequal pay

3.3 Governance (Reports on Corporate Governance)

- Bribery/Corruption
- Competition and antitrust law
- Forgery of documents
- Theft/Fraud/Breach of trust/Embezzlement

4. Data Protection Violations

- Data theft or loss:
 - Unauthorized access to sensitive information
 - Loss or theft of electronic devices containing sensitive data
- Data leaks or disclosures:
 - Unintentional disclosure of confidential data
 - Publication of data without the consent of the affected parties
- Violations of data protection policies:
 - Non-compliance with data protection laws and policies
 - Lack of security measures to protect personal data
- Phishing or fraud:
 - Phishing attacks aimed at obtaining personal information
 - Fraudulent activities targeting the misuse of data
- Violation of data protection rights:
 - Inadequate measures to protect the privacy of users or customers
 - Lack of transparency in data usage and processing
- Others

5. Violations of EU Law

- Violations of laws protecting whistleblowers
- Criminal offenses
- Violations of tax law
- Violations of anti-money laundering regulations
- Violations of customs and export control regulations
- Others

6. Other Complaints or Reports

If your complaint does not fall under any of these categories, you can still submit a report under this category. Every report will lead to an internal company investigation where the relevant indications will be followed up on.

Procedure for Handling Complaints

Submission of Complaints

To submit a complaint, please visit our company website and click on the "Compliance" tab. There you will find the complaint form, which you can fill out. You have the option to select the focus of your complaint and submit it either anonymously or with your personal information, providing a detailed description.

Handling of Complaints

Upon receiving a tip or report through our system, the reporting person will immediately receive an acknowledgment of receipt. Our internal team reviews the tip or report and conducts an assessment and plausibility check of the reported facts.

If the report indicates a human rights or environmental risk or a violation of corresponding duties, the matter will be handled in accordance with legal requirements.

The reporting person will be informed of the outcome of the review. This also applies if the complaint is not pursued further, for example, because the matter was already known, did not appear plausible, or lacked sufficient information. Please note that contact is only possible if the reporting person has provided their personal information.

If it is determined that a violation of a human rights or environmental duty has already occurred or is imminent, appropriate remedial measures will be promptly initiated. The effectiveness of these measures will be monitored.

Legal Framework

General Data Protection Regulation (GDPR):

- Processing Deadline: Data protection violations must be reported to the relevant supervisory authority within 72 hours of becoming aware of them unless there is no risk to the rights and freedoms of the affected individuals.
- Retention Period: Documentation of data protection incidents is securely stored in accordance with legal requirements.

Whistleblower Protection Act (HinSchG):

- Processing Deadline: Receipt of a report is confirmed no later than seven days after it is submitted. Within three months of acknowledging the receipt of the report, whistleblowers will receive feedback on the planned and already taken follow-up actions and the reasons for them.
- Retention Period: All incoming reports are documented and deleted three years after the conclusion of the procedure, unless a longer retention period is required.

Supply Chain Due Diligence Act (LkSG):

- Retention Period: Documentation is retained for seven years.