

# **Rules of procedure for the grievance process in accordance with Sect. 8, German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG)**

## **Introduction**

The winkler Unternehmensgruppe shall take responsibility for respecting and strengthening internationally recognized human rights within its own business units and through the appropriate management of its supply chains. The winkler Unternehmensgruppe shall implement all requirements of the German Supply Chain Due Diligence Act (LkSG) in terms of fulfilling due diligence around human rights and environmental protection and ensuring that they achieve the desired effect. A key, core element of this due diligence is to set up an effective grievance procedure that can be used to submit information on human rights and environmental risks or violations.

These Rules of Procedure communicate the essential characteristics of the grievance procedure and access to the procedure or rather, its availability, as well as the parties responsible. Further, they communicate what happens to incoming information; in other words, how the grievance procedure is carried out. The winkler Unternehmensgruppe places great value on presenting this information in a clear and understandable manner and creating the highest possible level of transparency around the process.

## **Purpose of the grievance procedure**

The grievance procedure shall offer every person or group of persons the opportunity to submit relevant information to the winkler Unternehmensgruppe, thus drawing attention to human rights risks (early warning system). However, persons or groups of persons shall also have the opportunity to provide information about the suspicion of a rights violation so that damage can be immediately avoided or minimized (access to appropriate remedy).

## **Target group of the grievance procedure**

Any person can submit information, regardless of whether this happens in Germany or abroad.

## **Types of information**

The grievance procedure enables persons to point out human rights and environmental risks, as well as violations of human rights or environmental protections duties that have arisen from the economic activity of the winkler Unternehmensgruppe in its own business units or in the supply chain.

## **Submission of information**

Information can be submitted at any time using two different channels. All information, regardless of the channel through which it is submitted to the winkler Unternehmensgruppe, shall be immediately processed further in the same manner.

- **Electronic information system:** The winkler Unternehmensgruppe shall make an electronic information system available in which information can be entered on a

web form. It can be used in the German and English languages. (<https://christian-winkler.daato.app/grievances/christian-winkler>)

- **Email:** [supplychain@winkler.com](mailto:supplychain@winkler.com)

### Processing the information

Information will be processed by selected, specially trained employees of the winkler Unternehmensgruppe. All the employees responsible for processing share the following characteristics:

- Impartial
- Independent
- Not bound by special instructions
- Sworn to secrecy
- Trained accordingly
- Provided with sufficient temporal resources

### Order of events in the grievance procedure

- **Confirmation of receipt:** Upon receipt of information, the person who submitted the information shall receive confirmation.
- **Check:** The information is checked centrally in order to determine whether or not the reported facts represent a human rights or environmental risk or a violation of human rights or environmental obligations. The company or supplier affected by the report is also checked. Finally, the information is forwarded to the responsible, in-house office at the winkler Unternehmensgruppe.
- **Establishing the relevant facts:** The facts of the matter shall always be established within three months. The persons responsible at the winkler Unternehmensgruppe are entrusted with establishing the facts. They act impartially and are sworn to secrecy.
- **Remedial measures:** If, while establishing the relevant facts, it is determined that a violation of human rights and/or environmental obligations is imminent or rather, has already occurred, remedial measures shall be implemented immediately.
- **Procedure:** Based on the findings after establishing the relevant facts, a recommendation as to how to proceed further shall be made.

### Protection against discrimination and reprisals

The protection of persons who have submitted information against discrimination or punishment for having submitted information is a key component of our grievance procedure. The following measures are designed to protect persons who have submitted information:

- All information will only be processed by a small group of selected, specially trained employees.
- All information, including personal data and other information, that could enable conclusions about the identity of the person who submitted the information, shall be handled confidentially. This also applies after the procedure is completed.
- In accordance with the legal provisions, the internal company documentation shall be retained for seven years and then destroyed.

The winkler Unternehmensgruppe shall protect persons who have submitted information against discrimination or punishment resulting from this information.

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As of 12/2024