



Code of procedure for complaints procedure in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chainsfor Schmitz Cargobull

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1. Preamble

The observance of human rights and environmental standards is given the highest priority at Schmitz Cargobull. We are only able to earn the trust of our customers and business partners, and in particular that of our employees, if we behave with integrity and within the law. We expect this also from our business partners within our supply chain.

This code of procedure regulates the principles and general conditions for the course of the complaints procedure demanded by the German Act on Corporate Due Diligence Obligations in Supply Chains (short: Supply Chain Act). Addressees of the code of procedure are both employees of the Schmitz Cargobull Group and external third parties.

2. Application area of the procedure

Thanks to the complaints procedure, attention can be drawn to human rights and environmental risks and to violations of human rights or environmental obligations in the Schmitz Cargobull supply chain. By providing the complaints procedure, Schmitz Cargobull aims to strengthen the integrity and reliability of its supply chains and promote ethical behaviour along the supply chain.

The procedure is open to all complaints that relate to our economic actions or the actions of a company in our supply chain and that relate to human rights or environmental risks as defined within Section 2 (2) and (3) of the Supply Chain Act. This applies in particular but is not limited to complaints relating to child labour, forced labour, slavery, occupational health and safety, freedom of association, inequalities of treatment, payment of equal remuneration, pollution or unlawful taking of land.

3. Reporting channels and contact data

Schmitz Cargobull employees have various options for filing a complaint. Please refer to the existing procedures for compliance reporting.

Schmitz Cargobull has set up an area on its website for employees and for people who do not work for the Schmitz Cargobull Group, specifically for complaints about risks or violations relating to the environment or human rights ([Corporate Social Responsibility \(www.cargobull.com\)](https://www.cargobull.com)). The contact details of the ombudsperson for the Supply Chain Act are stored there. This person can be contacted by telephone, e-mail or by mail. Complaints can be submitted in any language (telephone calls are only accepted in German and English).

4. Course of the complaints procedure

4.1 Confirmation of receipt of a complaint

On receipt of a complaint, the reporting person receives a confirmation of receipt and an offer to discuss the complaint in a dialog. On confirmation, the reporting person is informed of the next steps, the timing of the proceedings and their rights to protection against discrimination or punishment resulting from the complaint.

4.2 Clarification of facts

4.2.1 Initial assessment of a complaint

All incoming complaints are examined carefully and impartially.

The ombudsperson examines, as part of an initial assessment, whether the issue of the incoming complaint falls within the scope of this code of procedure. At the same time, he/she examines whether the complaint is plausible. Further actions to clarify the facts are initiated, depending on the result of this initial assessment.

The ombudsperson usually discusses the complaint with the reporting person. The aim of the dialogue is to understand the facts and the ideas and expectations of the reporting person with regard to possible remedial and preventive actions. The ombudsperson offers the reporting person in all cases the opportunity to provide further information on the complaint and, where necessary, to make the complaint plausible.

The initial assessment takes place typically within four weeks. The period may be shorter or longer in individual cases, depending on the severity of the possible violation, the degree of risk and the complexity of the facts.

4.2.2 Rejection of a complaint

If processing of the complaint is rejected, for example because it is not plausible or if the appeal does not fall within the scope of this code of procedure, the reporting person receives a message to that effect and is given the opportunity to further make the complaint more plausible.

An explanation of why Schmitz Cargobull considers the complaint of the reporting person to be implausible, unfounded or not relevant will not be provided if this is not permissible for legal or factual reasons.

4.2.3 Follow-up of a complaint

If an initial assessment shows that the complaint is plausible and falls within the scope of this code of procedure, the facts are forwarded to those people in charge of clarifying and investigating the facts in the Schmitz Cargobull Group for further processing.

4.3 Closure of the procedure

After conclusion of the investigation and processing of the facts, the result is communicated to the reporting person.

If the processing of the facts exceeds a period of three months after receipt of the complaint, the reporting person is informed of the status of the procedure and the status of the investigation. During this, only that information is provided whose notification does not jeopardize the conduct of the investigation.

Should it become clear after conclusion of the investigation that risks exist relating to environmental or human rights issues or that corresponding violations have occurred, Schmitz Cargobull will take both appropriate and suitable remedial actions and measures to avoid any repetition.

5 Protection against discrimination and prohibition of reprisals

Schmitz Cargobull attaches great importance to the protection of reporting people. We protect such people and those closely related to them (e.g. colleagues and relatives) when they make a complaint in good faith against any form of coercion, intimidation or harassment, as well as against any other hindrances (reprisals) that they experience or may experience as a result of filing a complaint. Schmitz Cargobull also protects other people who contribute to the investigation of suspected cases against reprisals by means of appropriate actions.

It may be difficult in individual cases for reporting people to fully determine the facts and to assess them correctly. A complaint may therefore sometimes prove unfounded after further investigation. However, if the reporting people have sufficient reason to believe that the information provided was true at the time of filing the complaint, they will receive the full protection of Schmitz Cargobull.

Violations of the principle of protection of reporting people will not be tolerated and can be punished with disciplinary action up to and including termination of the employment relationship.

However, where a complaint proves to have been falsely submitted, Schmitz Cargobull reserves the right to assert legal and criminal proceedings. Reporting people will neither be protected by law nor by Schmitz Cargobull in such cases.

6 Confidentiality

The confidentiality of the identity of the reporting person and of other people mentioned in the complaint and the impartiality of the clarifying people will always be maintained as part of the clarification and investigation.

Complaints can also be submitted anonymously, i.e. without disclosing the identity of the reporting person.

The ombudsperson as a lawyer with entitlement to receive complaints is obliged to maintain the

confidentiality. The identity of the reporting person will be disclosed to those people who are entrusted with the clarification and investigation of the facts only at the request or with the express consent of the reporting person. This also applies to other information from which the identity may be derived directly or indirectly. Information that is not disclosed by the reporting person shall remain confidential.

The people entrusted with the receipt of a complaint and clarification of the facts are independent and not bound by any instructions. This provides a guarantee of impartial action. They, too, are obliged to maintain confidentiality.

Schmitz Cargobull follows a strict *need-to-know* principle: Only those people required for the processing and clarification of the complaint are involved in the procedure and they receive only that information which is necessary for them.

7 Documentation and storage

Each complaint process, the related considerations and decisions and any actions taken are documented in an investigation report in accordance with the legal requirements.

8 Costs

The submission of a complaint is free of charge for the reporting people. Schmitz Cargobull reserves the right to take legal action only in the event of false complaints that are submitted intentionally.