Diehl Rules of Procedure for appeals under the Supply Chain Due Diligence Act (LkSG)

1. Introduction

The Diehl Group (hereinafter "Diehl") conducts its business in accordance with all applicable laws and its Code of Conduct, which must be observed without exception by all employees at every level of the organization and by all members of its governing bodies. Unfair or even illegal practices are incompatible with the Diehl Code of Conduct.

Diehl therefore encourages employees and third parties who become aware of human rights or environmental violations within Diehl Group companies or at suppliers, as defined under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG), to report such violations so that appropriate remedial action can be taken. Any identified risks of such violations should likewise be reported to enable appropriate preventive measures to be taken or enhanced as necessary.

These Rules of Procedure set out the available reporting channels, the respective responsibilities, and the detailed procedure for submitting a report.

2. Availability of Reporting Channels

The following reporting channels are available to whistleblowers free of charge:

- Digital whistleblower system at https://diehl.integrityline.com/frontpage
- Telephone: +49 30 99 25 71 46. When prompted, please enter Company Access PIN 4367
- Ombudsman Dr. Rainer Buchert, Kaiserstrasse 22, 60311 Frankfurt am Main, Germany Phone: +49 69 7103333-0 or +49 6105-921355 or +49 69 7103444-4
  Email: dr-buchert@dr-buchert.de
  Deputy Ombudsperson: Dr. Caroline Jacob, +49 69 7103333-0

China: Please note that, due to legal requirements, you must use only the following reporting channel for reports submitted from China: compliance-diehl-china@roedl.cn

3. Scope / Content of Reports

Under the complaints procedure, business partners, customers, and other third parties may report violations of human rights-related or environmental due diligence obligations under the LkSG, as well as any associated risks. Reports may also be submitted anonymously.

Human rights-related obligations in this context include, among other things, the prohibition of child labor, protection against slavery and the prohibition of disregarding occupational health and safety requirements. Environmental matters include substances that pose a risk to people or the environment, as well as actions or circumstances that may lead to human rights violations.

Reports should be based on information that the whistleblower believes to be accurate to the best of their knowledge and should contain sufficient detail to allow the allegations to be investigated.

4. Protection of Whistleblowers

All reports are treated confidentially. Information provided will be disclosed only, and only to the extent necessary, to those persons who need to be involved in handling the report, establishing the facts, and deciding on and implementing appropriate remedial and follow-up measures.

No person who submits a report in good faith may be sanctioned or otherwise disadvantaged as a result of having done so. A report is made in good faith if the whistleblower believes that their information is accurate and has reasonable grounds to believe that a violation of applicable laws has occurred. A whistleblower who knowingly makes false allegations about another person may be subject to criminal prosecution.
Any disadvantage or punishment imposed on a whistleblower for reporting an actual or suspected violation will not be tolerated.

Diehl takes measures to prevent, detect and correct acts of retaliation. Anyone who retaliates against a whistleblower who has reported an incident in good faith may be subject to disciplinary action, up to and including dismissal.
Suppliers that retaliate against whistleblowers may likewise be subject to consequences, up to and including termination of the contractual relationship.

5. Implementation of the Complaint Procedure

The following outlines the exact process for filing a report:

a) Receipt of the Report

Receipt of the report will be confirmed to the whistleblower, or a third party authorized by the whistleblower, within seven days.

b) Assessment, Fact-Finding and Remedial Action

The report will then be assessed for plausibility, and the next steps and responsibilities will be determined. If further information is required, the whistleblower will be contacted where possible.
Where there are specific indications of a violation, an internal investigation will be initiated.

Reports are investigated by Diehl employees who are specifically authorized for this purpose and have the necessary expertise. They act impartially and independently and, when performing their responsibilities under the complaints procedure, are not subject to instructions. They are also bound by a duty of confidentiality. The Human Rights Committee is responsible for the complaints procedure under the LkSG.

All information will be handled through a fair and confidential process, with particular regard to protecting the whistleblower's identity and in compliance with applicable data protection requirements. The principle of proportionality will also be observed.

Where possible and in accordance with statutory requirements, contact will be maintained with the whistleblower in order to clarify and, where appropriate, discuss the reported facts.

The time required to process a report depends on the circumstances of the individual case and may range from a few days to several months, for example where complex international matters are involved. Reports are given high priority, and Diehl will endeavor to clarify the facts as quickly as possible.

Where possible, the whistleblower will be informed of the progress of the procedure within the applicable time limits.

If a reported violation is confirmed, Diehl will take appropriate action to remedy the identified shortcomings. The necessary remedial measures will be implemented, monitored and documented. Diehl will also take appropriate preventive measures to minimize the risk of similar violations or infringements occurring in the future. The whistleblower will be informed of the outcome.

If the allegations are not substantiated, the case will be closed and the whistleblower will be informed accordingly.

Findings gained by Diehl from complaints that have been handled will be incorporated into the risk analysis.

All reports received will be documented, retained and deleted in accordance with the applicable statutory requirements.

6. Review of Effectiveness

The complaints procedure is regularly reviewed for effectiveness and improved as needed.