

# Complaint Procedure Rules regarding of Violations of the Supply Chain Sourcing Obligations Act (LkSG) within the Meaning of § 8 (2) LkSG and under the Whistleblower Protection Act (HinSchG)

## 1 Purpose of the complaint procedure

The complaint procedure serves as an early warning system and is a key component of our compliance management system. The aim is to identify possible human rights and environmental risks, as well as potential grievances and violations of national and EU law, as early as possible and to minimize or eliminate them.

## 2 Complaint procedure

### 2.1 To whom is the complaint procedure addressed and what types of reports can be submitted?

All employees of the Brose Group, including temporary workers (agency workers) and external parties (such as customers, suppliers, business partners, employees of direct and indirect suppliers, stakeholders, trade unions and non-governmental organizations, etc.) can submit their reports as part of the complaints procedure.

You can report human rights and environmental risks and violations. The information may concern the Brose Group's own business division as well as the supply chain and other business partners of the Brose Group.

In addition, the Brose whistleblower system also serves to report violations of other legal provisions, such as corruption, antitrust violations, or betrayal of secrets, as well as other national and EU legal provisions within the meaning of the German Whistleblower Protection Act (HinSchG).

### 2.2 How can I submit a complaint or report?

Complaints and tips can be submitted via one of the reporting channels in the web-based Brose whistleblower system at <https://www.brose.com/de-en/company/responsibility/>. The Brose whistleblower system is available around the clock in 17 languages and free of charge.

In the Brose whistleblower system, you can submit your report, upload documents, and contact the internal reporting office. This is done via a protected and confidential mailbox. The Brose whistleblower system also offers the option of leaving a voice message using a free telephone number.

In addition to the Brose whistleblower system, there are other reporting channels available to you, such as e-mail, letter or personal contact with the internal reporting office. You can also submit a report to us completely anonymously; you do not have to reveal your identity at any time. You can use the following reporting channels for this purpose:

#### **Mail**

Brose Fahrzeugteile SE & Co. Kommanditgesellschaft, Coburg  
ZRE/Compliance (Internal Reporting Office)  
Attn. of Mr. Thomas Schüssel  
Max-Brose-Straße 1  
D-96450 Coburg

#### **E-Mail**

[Compliance@brose.com](mailto:Compliance@brose.com)

### **In person**

By prior appointment via [Compliance@brose.com](mailto:Compliance@brose.com)

Any misuse of the complaints procedure, such as the assertion of false facts, will not be tolerated and may lead to sanctions and liability for damages.

## **2.3 Sequence of the appeal procedure**

### **2.3.1 Review of the complaint**

All complaints will be reviewed by the employees of the internal reporting office under the direction of the Compliance Department as an independent internal body within the meaning of the law to determine whether the complaint contains sufficient information for further processing. If necessary, you as the whistleblower will be asked further questions so that we can gain a better understanding of the facts of the case, as well as to inquire about your expectations regarding remedial action or follow-up. However, inquiries may only be made to the extent that they do not affect internal inquiries or investigations and do not affect the rights of data subjects.

You will receive an acknowledgement of receipt of your report within 7 days.

If there is insufficient information or suspicion of misuse and/or it is not possible to contact you, the case will be closed.

If a report is made that does not fall within the scope of the complaints procedure, the internal reporting office can submit the report to the responsible department while maintaining confidentiality.

### **2.3.2 Processing of the report**

The internal reporting office investigates the report and/or consults other departments within the company for support. In all cases, the employees of the internal reporting office who have access to the reports in the Brose whistleblowing system are subject to a special written confidentiality agreement. The identity of the whistleblower is not disclosed to employees who are not part of the internal reporting office.

The internal reporting office monitors the processing of the report and that there are no conflicts of interest among any other employees involved in the internal reporting office.

### **2.3.3 Developing and following up on corrective actions**

If the report is confirmed during processing by the responsible employee of the internal reporting office, remedial or follow-up measures are developed, if necessary, with your cooperation. The implementation of the remedial or follow-up measures by the parties concerned is followed up by the internal reporting office.

### **2.3.4 Conclusion**

In all cases, you will receive feedback after 3 months at the latest and will be informed of the result of the investigation.

## **2.4 How am I protected as a whistleblower?**

Confidentiality and the protection of whistleblowers have the highest priority in the Brose Group. Your report is in safe hands. The whistleblower system is provided by an external partner, WhistleB, to protect your anonymity and confidentiality of identity confidentiality. Communication via the whistleblowing system is encrypted and password-protected. All reports are processed confidentially, which means that the name of the whistleblower may not be passed on to other employees who are not part of the internal reporting office without their consent. Exceptions to this principle are regulated by law (see § 9 HinSchG). The deliberate or reckless disclosure of the identity of the whistleblower constitutes an administrative offense.

Your personal data will be processed and deleted in accordance with applicable data protection requirements and in compliance with the LkSG or HinSchG. For more information, please refer to our data protection information.

Brose will not tolerate any retaliation or other negative consequences for the whistleblower as a result of their report. This applies equally to all reports submitted under the German Supply Chain Due Diligence Act (LkSG) and the German Whistleblower Protection Act (HinSchG). If you believe that you are exposed to negative consequences as a result of your report, you can submit a report via the Brose whistleblower system or contact the Compliance department directly.