

Rules of Procedure on the Complaints Procedure in the Event 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 complaints procedure

The complaints 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.

The procedural rules apply to all reports submitted via the Brose whistleblowing system (WhistleB).

2 Complaint procedure

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

All employees of the Brose Group including temporary workers and external parties (such as customers, suppliers, business partners, employees of direct and indirect suppliers, stakeholders, trade unions and NGOs, etc.) can submit their complaints and tips within the framework of the complaints procedure.

You can report violations of human rights and environmental standards. The notices can concern their own business division as well as the supply chain and other business partners of the Brose Group.

In addition, the Brose whistleblower system is also used 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 as defined by the HinSchG.

2.2 How can I submit a complaint or tip?

Complaints and tips can be submitted via one of the reporting channels in the Brose whistleblower system under [Compliance - Brose Fahrzeugteile](#). The Brose whistleblower system is available around the clock in seventeen languages and free of charge.

In the Brose whistleblower system, you can submit your report, upload documents, and contact the processor. This is done via a protected and confidential mailbox.

In addition to the Brose whistleblower system, you can still use all other reporting channels such as e-mail, telephone, or letter. You can submit a report to us completely anonymously; you do not have to reveal your identity at any time.

In addition, all Brose employees can also contact their managers, the compliance department, or the works councils.

Brose is participating in a pilot project of the Automotive Industry Dialogue - the Intercompany Grievance Mechanism (UBM) in Mexico. This mechanism is designed to help close protection and accountability gaps and improve access to redress for affected parties through a joint approach, as well as to prevent potential damage. The UBM is designed to address complaints of (potential) adverse impacts along the upstream value chain of participating companies in Mexico. The UBM will be continuously developed with the involvement of local rights holders.

Deliberate abuse of the whistleblower system, such as the assertion of false facts, will not be tolerated and may result in sanctions.

2.3 Sequence of the appeal procedure

2.3.1 Review of the complaint

All complaints will be reviewed by the Compliance Department staff as an independent internal position 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.

2.3.2 Processing of the tip

The Compliance department investigates the tip itself or passes the investigation on to another responsible department within the company. In all cases, the case handlers who have access to the reports in the system are subject to a special written confidentiality agreement.

The Compliance department monitors the processing of the tip and that there are no conflicts of interest among the case handlers involved.

2.3.3 Developing and following up on corrective actions

If the tip is confirmed during processing by the responsible case manager, remedial or follow-up measures are developed, if necessary, with your cooperation. The implementation of the remedial or follow-up measures at the affected parties is followed up by the responsible department and the Compliance department.

2.3.4 Conclusion

In the case of all indications, 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 are a high priority for the Brose Group. Your information is in safe hands. The whistleblower system is provided by an external partner, WhistleB, to protect your anonymity and identity confidentiality. The whistleblowing process is encrypted, and password protected. All whistleblowing is handled in confidence.

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 because of his or her report. If you believe that you are subject to negative consequences because of your report, you can submit a report via the Brose whistleblower system or contact the Compliance department.