



GLOBUS

Rules of Procedure for the Complaints Procedure under the German Supply Due Diligence Law (Lieferkettensorgfaltspflichtengesetz, LkSG)

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The complaints procedure enables persons to point out human rights and environment-related risks as well as violations of human rights-related or environment-related obligations that have arisen as a result of the economic actions of a GLOBUS Group company in its own business area, in the supply chain or in the area of business partners.

In the following, we describe the complaint procedure in place at GLOBUS.

1 What is the purpose of the complaint procedure?

The purpose of the complaints procedure is to be able to identify, process and remedy potential grievances within the scope of GLOBUS' business relations and in its own business area at an early stage. It is to be seen as an early warning system through which problems are identified and, in the best case, solved before people or the environment are actually harmed. In addition, the grievance procedure can provide access to appropriate remediation when needed.

With the help of the complaints procedure, internal and external persons can point out human rights and environmental risks and violations to GLOBUS that have arisen in its own business area, in the supply chain or in the area of business partners.

2 Who can provide information?

Information can be provided by internal and external persons. Whistleblowers can come from within the own business unit or exist in the supply chain of GLOBUS, which are potentially affected by human rights or environmental violations. Potentially affected persons can be e.g. own employees, employees of direct or indirect suppliers or residents around local sites.

It is necessary to point out, then the pointing out persons do not suffer any disadvantages from a submitted complaint.

3 How can complaints be submitted?

Complainants can submit information on human rights-related and environmental grievances to GLOBUS via the following channels. In order for GLOBUS to contact the complainant, it is necessary to leave a means of contact (e-mail address, telephone number).

3.1 Languages of the complaint procedure

The complainant can choose in which language complaints will be submitted. The translation will be provided by GLOBUS.

3.2 Contact form

Whistleblowers can contact GLOBUS via the homepage www.globus.de by clicking on the tab "Contact". Here there is the possibility to fill in a contact form. The category to be selected is "Qualitätssicherung".



Under the tab „Qualitätssicherung“, complaints are forwarded to the responsible agents, where they are processed impartially and independently. All languages can be used, the translation is done by GLOBUS.

3.3 Customer Hotline

In addition, it is possible to contact GLOBUS by telephone via the contact hotline 0800-515 4444. The customer hotline is manned from Monday to Friday from 9 am to 6 pm. Here, whistleblowers can contact one of the hotline employees, who are sworn to secrecy, by telephone in German and in English, who will record the complaint. The customer hotline forwards the inquiry to the responsible person via the e-mail address lieferkette@globus.net.

3.4 E-mail address

Furthermore, it is possible to use the e-mail address lieferkette@globus.net via the "Contact" tab to submit information.

Information received via the e-mail address is stored in the "Supply Chain" mailbox, to which the responsible persons have immediate access. All languages can be used, the translation will be done by GLOBUS.

4 Sequence of the complaint procedure

4.1 Time frame

Depending on the information provided, an initial substantive response to the complainant's complaint is usually provided after 14 days at the latest. This applies regardless of the complaint channel and the language in which the complaint is received.

4.2 Contact form

When receiving tips via the contact form, the whistleblower can select the appropriate category "Qualitätssicherung". According to the selection of the categories, the immediate report is assigned to the responsible clerks via the "Mail-Minder" system. Only the employees who are responsible for the content of the implementation of the LkSG have access to the tip. The receipt of the notice is automatically confirmed to the whistleblower immediately, together with the instructions on the further course of the process.

4.3 Customer hotline

When contact is made by telephone, the tip first arrives at the general hotline. The employees in the customer hotline have been trained and are informed about the forwarding of tips to the

responsible employees. The information is then recorded and processed by the relevant employees. The persons involved treat the information confidentially and are all sworn to secrecy.

4.4 E-mail address

In addition, it is possible to use the e-mail address lieferkette@globus.net via the "Contact" tab to submit tips.

Information received via the e-mail address is stored in the "Supply Chain" mailbox, which can be accessed directly by the responsible employees. Receipt of the tip is automatically confirmed to the compliant immediately, along with instructions on how to proceed with the process.

4.5 Procedure after receipt of a notice

After sending the tip or communicating it by telephone, the whistleblower will receive confirmation of receipt. Each complaint is given a sequential number and the whistleblower is informed who his contact persons are (employees of the Quality Assurance and Legal departments) and how they can be contacted (e-mail address, telephone number). These employees are bound to secrecy, are not bound by instructions and are impartial. Depending on the facts of the case, employees from other departments are called in and included in the same confidentiality obligations.

4.5.1 Initial evaluation

Within 14 days of receipt of the notice (initial evaluation), an initial review of the notice is conducted. This examines which topics or contractual partners are affected. After the initial evaluation, the compliant will be informed immediately about the further course of his complaint.

4.5.2 Clarification of the facts and optional dispute resolution

If necessary, a detailed clarification of the facts is carried out with the whistleblower. The persons entrusted by the company with the implementation of the procedure will discuss the facts with the whistleblower. Where relevant and possible, the option of an amicable settlement of the dispute is examined (amicable settlement procedure) in order to enable a solution to be found to the problems that have arisen. This can be done, for example, by involving a mediator. In this case GLOBUS can agree with the complainant who will appoint a mediator.

As far as no violations can be determined, the examination procedure will be discontinued and this will be communicated to the whistleblower.

4.5.3 Procedure for amicable settlement

In order to provide the opportunity for an amicable settlement of a dispute, the parties involved can jointly attempt to find a mutually agreeable solution with the help of a neutral and mediating third party. The goal is to develop remedial or preventive measures that are supported by all parties. Depending on the case, an independent organization may be called in to assist the person making the referral.

4.5.4 Developing a solution

If a violation is identified, the responsible management is informed.

In consultation with the whistleblower, a proposal for remedial action is developed. Remedial measures may vary depending on the incident and the level of risk and depend on the individual case.

4.5.5 Implementation of remedial measures

Once a solution has been established, it is implemented. The respective remedial measures depend on the individual case and the intensity of the violation. Depending on the intensity, an awareness of the due diligence obligations can be created, combined with e.g. training up to the establishment of new processes to remedy the grievances.

4.5.6 Review of the measures taken

Together with the whistleblower, the measures taken are closely reviewed with regard to their effectiveness. Depending on the intensity, adjustments to the remedial measures are also possible in order to achieve the desired effectiveness.

4.5.7 Feedback to the whistleblower

Once the complaint procedure has been completed, the person providing the information will receive a final message via the selected communication channel, if necessary stating the measures implemented. This concludes the processing procedure.

4.5.8 Effectiveness review

The remedial measures taken are reviewed on a regular basis. As a rule, an initial review of the effectiveness of the remedial measures is carried out in the first 3 months after they have been established. After positive development, the measures are reviewed annually and on an ad hoc basis. GLOBUS will remain in contact with the whistleblower after the conclusion of the complaint process to ensure that there is no retaliation against the whistleblower by the respondent.

5 Processing of complaints and tips

The processing of complaints and tips is carried out by the departments „Legal“ and „Qualitätssicherung“ (Quality Assurance). It is made clear that the acting employees are impartial in their actions and are not bound by instructions. The persons entrusted by the GLOBUS Group with the implementation of the procedure offer a guarantee of impartial action, in particular they are independent and not bound by instructions. They are bound to secrecy.

The protection of whistleblowers and complainants is ensured by individual measures. For example, contacting GLOBUS does not require the submission of complete names and addresses.

6 Effectiveness review of the complaints procedure

The effectiveness of the complaint procedure is reviewed at least once a year as well as on an ad hoc basis. This is done in particular if the existing risk situation of the GLOBUS Group changes significantly or if a significantly expanded risk situation must be expected in the own business area or at the direct supplier. This would be the case with the introduction of fundamentally new product categories or a new business field.