

Procedural rules for processing complaints in accordance with § 8 Supply Chain Act (LkSG)

(Status: 04/08/2024)

The KNDS Deutschland Group assumes responsibility for respecting and strengthening internationally recognized human rights within its own business units and through appropriate management of its supply chains. An essential core element of these due diligence obligations is the establishment of an effective complaints processing procedure through which notifications of issues relating to human rights and environmental risks or violations can be made.

These procedural rules provide information on the essential features of the complaints procedure, access or availability of the procedure, and the areas of responsibility. It also provides information about what happens with incoming notifications and complaints, i.e. how the complaint procedure is carried out.

1. Scope of the complaint procedure

The complaint procedure enables individuals to point out issues relating to human rights or environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of the KNDS Deutschland Group's economic activities in its own business or in its supply chain.

2. Persons authorized to complain

The reporting office receives notifications and complaints from employees as well as from external persons, e.g. employees of customers or suppliers or other third parties.

3. Reporting channels

Complaints and notifications can be submitted via various channels at any time. All complaints and notifications will be handled immediately and in the same way, regardless of how they reach KNDS Deutschland.

- KNDS Deutschland provides an electronic whistleblowing system. The whistleblowing system can be accessed via the following link:

<https://kndsdeutschland.integrityline.app/>

- By post:
KNDS Deutschland GmbH & Co. KG
GF-CO
Krauss-Maffei-Straße 11,
80997 Munich, Germany
- Email: compliance@knds.de

All channels ensure that notifications are handled confidentially. The electronic whistleblower system enables the creation of a mailbox through which the whistleblower can communicate with the Compliance Department while keeping his or her identity confidential.

4. Sequence of the complaint procedure

Once a complaint or notification has been received, the whistleblower - provided his or her contact details are available - will receive an acknowledgment of receipt within 7 days. KNDS Deutschland will be in contact with the whistleblower throughout the entire process, provided this is desired and a means of contact is available. As a rule, complaints or notifications are first examined to determine whether the reported matter poses a risk to human rights or the environment, or constitutes a violation of human rights or environment-related obligations.

If there is an initial suspicion of relevant misconduct, an internal investigation will be conducted to ascertain whether the information is true and to verify, understand and objectively confirm or refute the facts of the case as effectively and efficiently as possible.

An internal investigation is conducted directly by KNDS Deutschland Compliance or is coordinated by KNDS Deutschland Compliance involving the relevant specialist departments. In the course of an internal investigation, an exchange with the whistleblower may be sought in order to resolve any queries.

The results of the internal investigation are documented in a report and appropriate measures are recommended along with responsible parties and a time schedule. Measures may be preventive in nature as well as corrective or sanctioning. The whistleblower will generally be appropriately informed within 3 months of receipt of the confirmation of receipt (provided that the contact details of the whistleblower are available). Feedback is provided only to the extent that it does not affect internal investigations and the rights of the data subjects.

The employees responsible for the complaints procedure follow up on whether and to what extent remedial measures are implemented:

5. Verification of the effectiveness of the procedure

KNDS Deutschland strives to continuously improve the mechanisms for handling whistleblower notifications and internal investigations. User data, experience, and constructive feedback from the whistleblower process are used for this purpose on at least an annual basis, or in individual cases if the need arises.

6. Protection of the whistleblower

Provided that the whistleblower acts in good faith, i.e. has reasonable suspicion, he or she shall not suffer any disadvantage from reporting violations or suspicions of violations, even if a suspicion proves to be unfounded. Direct or indirect reprisals for (alleged) whistleblowing will not be tolerated and are a violation that can be reported. This also applies to threats or attempts to discriminate.

It is also a violation if a person obstructs the submission of a notification, or impedes or prevents the investigation of a notification.

All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, will be treated confidentially. This also applies after the conclusion of the proceedings.