

Rules of procedure for the whistleblower system according to the German Supply Chain Act ("LkSG")

Purpose

As part of our corporate social responsibility obligations, Erdrich is committed to acting in a sustainable and responsible manner. In our business activities, we attach particular importance to ensuring human rights are respected, and the environment protected. This includes ensuring the working conditions in our global supply chain are fair, safe and healthy.

To ensure these goals are met, we have established a code of conduct that must be followed by all of our business partners. We regularly check compliance with these standards and are continually striving to improve them. An important instrument for this is the whistleblower system described below. This allows us to identify risks to human rights and the environment along our entire supply chain at an early stage, and remedy any breaches.

Scope of application

The whistleblower system is used to submit tip-offs about risks to human rights and the environment and breaches of duty in connection with the economic activities of a company in its own area of activity or that of a direct supplier (section 8, paragraph 1 of the German Supply Chain Act [LkSG]). This can be done easily and – if preferred – anonymously.

Communication channels

The Erdrich Group uses a digital reporting platform for communication; this is available to both internal and external personnel to report any breaches of obligations under the LkSG. The platform can be accessed at: **erdrich.reporting-channel.com**.

In addition to the internal announcement on the reporting platform, the link is also published on the respective company website. The reporting office is operated externally. The reports received are processed by our compliance officer (**complianceofficer@erdrich.de**).

Confidentiality and protection against discrimination

Tip-offs can be submitted with a name or anonymously. However, the more information we are given, the better we can investigate the matter and remedy the situation. Dealing with a tip-off openly and transparently often helps to resolve the issue. However, this decision rests with the whistleblower. If consent for transparent handling of the tip-off is not given, the identity of the whistleblower will be handled in confidence.

Erdrich also prohibits any form of discrimination and intimidation directed at the whistleblower. Retaliation against the whistleblower is strictly prohibited. The employees handling the complaint procedure will remain in contact with the whistleblower even after the procedure is complete, if desired, in order to ensure the best possible protection against discrimination and reprisals.

Employees responsible for handling tip-offs must handle all information received in confidence. They are strictly prohibited from discussing such matters with third parties either inside or outside Erdrich, unless this is permitted or required by law.

Procedural costs

There is no charge for utilising the procedure set out in these rules of procedure.

However, in principle, Erdrich will not cover any costs or expenses that the whistleblower may incur in connection with the use of the whistleblower system. This specifically refers to any travel costs or costs for legal advice incurred.

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Content of the tip-off

By providing the following voluntary information, you will help us process your tip-off effectively:

- **Which Erdrich company is involved?** Name of the Erdrich company.
- **What are you concerned about?** Potential breaches are grouped together in suggested categories.
- **When did it take place?** Provide the date of the potential breach.
- **Where did it take place?** Provide the location of the potential breach.
- **Who is involved or affected?** Provide the name of any persons potentially involved.
- **Details of your report:** Statement of the risk or breach of duty (brief description of the facts, date/period and any evidence), e.g. how many people are affected. How serious is the breach, or how serious are the detrimental impacts?
- **Upload window:** Files and documents can be uploaded to support the report.
- **Your optional contact details:** Contact details can be provided. The report can also be sent anonymously.

In addition to the written report, it is also possible to submit a voice recording. Name and contact details of the whistleblower and, if different, the person(s) affected.

Process for investigating the tip-off

1. Receipt of the tip-off

Receipt of the tip-off will initially be confirmed in writing or electronically within 7 days, if contact details have been provided.

2. Investigating the tip-off

Once the tip-off has been received, it is then registered as a case by the compliance officer. The first step is to check whether there is sufficient evidence for the tip-off.

If this is the case, the compliance officer convenes the compliance task force to objectively examine and follow up on the tip-off. The members of the compliance task force vary depending on which incident and persons the tip-off involves, or expanded with internal specialists such as lawyers, forensic experts, public prosecutors, etc., in order to properly investigate the tip-off and clarify the incident.

If there is not sufficient evidence in support of the tip-off upon receipt, the compliance officer can complete the review process without convening the compliance task force. If a tip-off is dismissed, the whistleblower will be informed of this and notified that it does not fall within the scope of application of the LkSG.

3. Communication to clarify the situation

If the tip-off is followed up, the process to clarify the situation begins. Erdrich's goal is to determine whether a breach of human rights or environmental concerns has occurred or is imminent. If the person providing the information has given their contact details, contact may be made if there are any questions which could clarify the situation.

4. Initiating remedial actions

If a breach of human rights or environmental obligations is suspected or confirmed at a supplier, the investigation team in charge will examine which remedial actions are necessary and appropriate for the specific case. This includes, for example, discussions with suppliers to develop a process for ending or minimising a breach, which includes a schedule (remedial action plan) or external supplier audits. Depending on the outcome of the actions, business decisions are made to appropriately address any identified breach of human rights or environmental obligations or a risk to human rights or the environment. This can result in the dissolution of business relationships. When determining remedial and preventive actions, it is particularly important to take the whistleblower's expectations into account.

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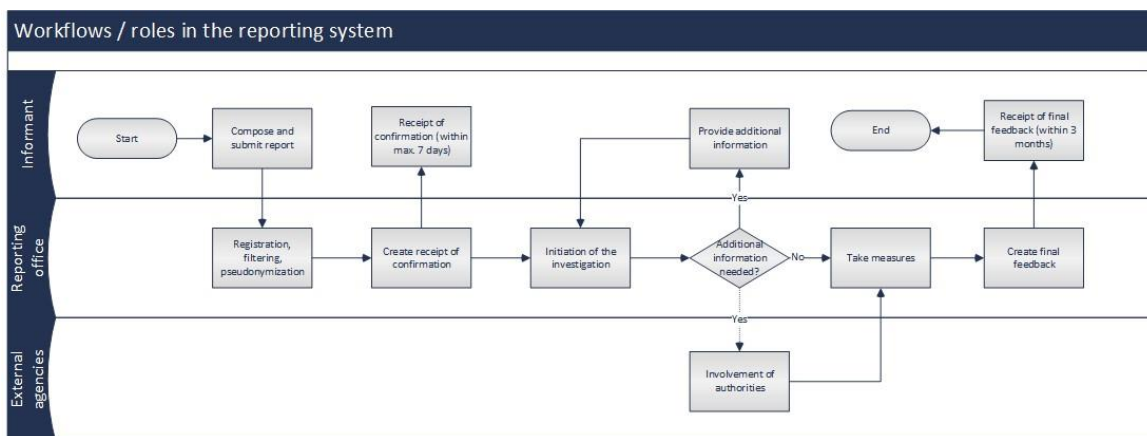
5. Implementation and verification of the effectiveness of the remedial actions

The compliance task force entrusted with the matter and the whistleblower will continue to check whether the remedial actions have been successfully implemented.

6. Tip-off fully processed, message to conclude the whistleblower system

The results of the investigation, the remedial actions, and information as to whether the tip-off has been resolved are documented in an internal final report. The whistleblower and any suppliers affected will be informed in writing about the result and conclusion of the procedure.

Here is a summary overview of the whistleblower system process:



Effectiveness of the whistleblower system

The effectiveness of the whistleblower system is checked once a year and as needed. As part of this, all incoming reports are also regularly evaluated with the aim of ensuring continuous improvement and prevention. For this purpose, the compliance officer documents the incoming reports and their processing status in a quarterly report.