Rules of Procedure for the LkSG (German Act on Corporate Due Diligence Obligations in Supply Chains)

#### Introduction

Apleona has committed to acting responsibly, including when dealing with our supply chains. Responsible business practice includes continuously reviewing and further developing our due diligence processes. Every report helps us with this.

We therefore want to give everyone – our employees, our suppliers and contractors, our other business partners, employees in our supply chains, customers, and shareholders – the opportunity to express concerns with regard to human rights or environmental issues relating to Apleona easily, and also anonymously if necessary, and to bring attention to any irregularities in the field of activity of our company or of a supplier.

The following potential risks or violations may be the subject of a report, for example:

- Human rights risks/violations:
  - Disregarding occupational health and safety (as defined by national regulations), child labor below the minimum permissible age/forced labor/slavery, practices akin to slavery
  - Disregarding freedom of association/discrimination (ethnicity, disability, age, gender, religion)
  - Withholding an adequate living wage
- Causing harmful soil change, water and air pollution, harmful noise emission, and excessive water consumption
- Environmental risks/violations: From participation in the production and disposal of products containing mercury/from the production or use of certain persistent organic pollutants/risks from the import and export of waste.

We ensure that every whistleblower is protected from reprisals.

Retaliatory measures against a person who has reported a violation to the best of his or her knowledge are therefore prohibited.

All information is subject to confidentiality within the framework of the legal provisions, if desired.

Every report can also be made anonymously using the online input tool. Whistleblowers do not suffer any disadvantage or harm as a result of making a report provided they acted to the best of their knowledge and in good conscience and do not break the law themselves.

If you have indications that you are subject to retaliatory measures, please report this to Compliance so that we can respond appropriately. Retaliatory measures in response to reports that were made to the best of the whistleblower's knowledge can be reported via <u>Compliance Communication</u>. If you knowingly provide false or misleading information, however, you will have to face the consequences.

#### Step 1: Making contact

These channels are open to everyone. You can contact us in the following ways:

• By e-mail:

German: lieferkettensorgfaltspflichten@apleona.com

English: <a href="mailto:supply-chain-due-diligence@apleona.com">supply-chain-due-diligence@apleona.com</a>

• By mail:

Apleona GmbH, An der Gehespitz 50, 63263 Neu-Isenburg, Germany

Compliance/Supply Chain Due Diligence

• Online:

Via our whistleblower portal Compliance Communication

All channels can be selected in English or in German If another language is necessary to handle the report in individual cases, a translation service can be included.

Other languages are also available when using our online whistleblower portal Compliance Communication. Technical support for the application is provided by the independent operator Business Keeper GmbH and it is stored on protected servers in Germany. Reports can be made online here worldwide in 19 languages around the clock and seven days a week. If you want to, you can make your report anonymously.

- The information that you save will be treated as confidential and only passed on to the relevant departments required for further processing.
- The information that you report may result in the initiation of internal and official investigations and other consequences. Therefore, please only communicate information that you believe to be true to the best of your knowledge. If you knowingly provide false or misleading information, you will have to face the consequences.
- Please note that Compliance Communication is not an emergency service! Please do not use this service to report any immediate risk to life, health, or property, as this communication channel is not designed for this purpose. If necessary, inform the relevant authorities.

All information received is handled by our trained staff on the LKSG team for further processing in line with the legal requirements, taking account of whistleblower protection.

### Step 2: Confirmation of receipt within seven days

Each whistleblower receives confirmation of receipt and a contact person for the further course of the procedure within seven days. During the procedure, we endeavor to communicate in the language that ensures the best possible understanding.

### Step 3: LKSG expert team checks plausibility

After receiving the report, our LKSG expert team initially checks the plausibility (sufficient substantiation) of the report and defines the internal responsibilities. If departments other than the LKSG expert team are responsible for the problem that you have reported – even if this comes under one of the report categories – then your report will be passed on to the relevant department. In the case of a rejection, the whistleblower is given an explanation. Our LKSG expert team is made up of experts from the relevant specialist areas who act professionally independently and autonomously to the greatest possible extent when reviewing reports.

Step 4: Further clarification of the facts in consultation with whistleblowers, with possible involvement of other participants

In consultation with the whistleblower, other participants may be involved to help further clarify the facts. Suspected cases are investigated. An investigation may be carried out by internal or external investigation specialists. Proposals to remedy the situation are then developed, possibly in consultation with the whistleblower, and any violations are systematically dealt with.

The results and any derived measures are expected to be communicated to the whistleblower within around three months of the confirmation of receipt.

### Step 5: Concluding the procedure and archiving

The facts of the case and the remedial measures are archived by us in accordance with the legal requirements. Voluntary feedback from the whistleblower on the overall process after the conclusion of the procedure helps us with the further development and annual review of the effectiveness of our complaints procedure.

We endeavor to meet the specified deadlines for the procedure. If a delay is foreseeable in individual cases due to additional measures to clarify the facts, then the whistleblower will be informed.