Syntegon Complaints Procedure Rules according to the Supply Chain Act & Procedure Rules for Compliance Cases



Introduction:

Syntegon is committed to complying with applicable legal regulations on human rights and environmental due diligence, both in its own business operations and throughout its supply chain. Our business partners also undertake to comply with these due diligence obligations. Syntegon has a complaints system through which internal and external persons (business partners and other third parties) (hereinafter referred to as "Whistleblowers") can inform the company of human rights or environmental risks, violations or imminent violations worldwide in its own business area and/or in the supply chain. Persons who are not directly affected by risks or violations also have the opportunity to submit information on risks and possible violations via the reporting channels listed below.

This is not limited to Syntegon's business activities in Germany, but applies to Syntegon and all Syntegon suppliers worldwide.

Violations of the Syntegon Code of Conduct or the Syntegon Code of Conduct for Business Partners can and should also be reported here.

These rules of procedure describe how the reporting system works and how the reports and Whistleblowers are handled.

Reporting system

Syntegon operates a company-wide, transparent, public and accessible standardized complaints and reporting system. The complaints and reporting system is accessible to everyone. Employees as well as persons and organizations outside Syntegon can report complaints and tips here.

Reporting channels (complaint channels)

Syntegon has various reporting channels that can be used for complaints or reports:

(1) The Syntegon Compliance Hotline is a tool where complaints or reports can be submitted 24 hours a day, seven days a week. This can be done in writing or by telephone – anonymously if required. The Syntegon Compliance Hotline is available in many different languages and is managed by an independent operator. The data is managed in a dedicated high-security data center, contractually guaranteed in Germany.
(2) Reports and complaints can also be submitted directly to the Syntegon Legal & Compliance Department: compliance.committee@syntegon.com
(3) Syntegon employees can also submit their report to their supervisor.

Confidentiality

All complaints and reports will of course be treated confidentially and can also be submitted anonymously. Confidential data may only be passed on if this is necessary and legally permissible. All managers are also obliged to forward reports received confidentially via the reporting channels described above.

Dealing with complaints and reports/responsibility of the Legal & Compliance department as a reporting office

All complaints will be treated in a fair and transparent manner and – to the extent permitted by law – equally.

Complaints about serious violations of human rights and environmental obligations are prioritized and the relevant Syntegon departments are informed accordingly.

All complaints or reports – regardless of how they are received – are processed by the Syntegon Legal & Compliance department (hereinafter referred to as the "Reporting Office"). The Reporting Office reports directly to the CEO of the Syntegon Group.

The employees of the Reporting Office are trained specialists. They are independent and not bound by instructions and are subject to a special duty of confidentiality.

Processing complaints and reports (dealing with complaints and reports)

The Reporting Office checks whether the complaint or report contains sufficient information to carry out a further investigation.

If the Reporting Office requires further information, it will contact the person providing the information, if this is actually possible.

As soon as the complaint or report has been examined, the Reporting Office can forward the case to another responsible department in the company for processing and clarification or to a competent authority. The Reporting Office can also process the complaint or report itself. If an internal investigation is required, an investigation mandate is issued by the Syntegon Compliance Committee. During the investigation, the Reporting Office examines all relevant documents, talks to witnesses and victims and analyzes electronic data if necessary.

At the end of the investigation, the results are summarized in a report and sent to the internal departments that require this information. The possible results of the investigation include recommendations for disciplinary measures or other remedial measures, for example in risk management or other internal processes.

The following principles apply to the processing of complaints and reports and the clarification of facts:

- Any clarification of facts must be fair, objective, without prejudice and with respect.
- The persons affected by the complaint or report have the right to be heard.
- Data and information must be treated confidentially.
- Persons who process complaints or investigate the facts must report a conflict of interest if they notice that it is difficult for them to conduct the investigation objectively for personal reasons.

Notification and protection of the Whistleblower

No later than seven days after receipt of the complaint, the person providing the information will receive confirmation of receipt of the information. The Reporting Office will contact the Whistleblower to clarify any unresolved issues with him or her, insofar as this is legally required.

No person shall suffer any disadvantage from reports made in good faith to Syntegon. This also applies if a report subsequently turns out to be unjustified. On the other hand, of course, knowingly disseminating false information is a punishable offense in many countries ("prohibition of defamation").

The person providing the information is protected. Neither your name nor details from the report may be disclosed without good reason. If actually possible and legally permissible, the Whistleblower will be informed within three months of the measures taken by Syntegon – even if the investigation has not been completed by then. Under these conditions, he/she will also receive information about the results of the examination as soon as they are available.