



## Complaint procedure of the BGH Group

### Rules of procedure for whistleblowers

#### What can be reported?

You can report violations of human rights and environmental obligations as well as related risks.

Your reports can concern the BGH Group's own business, including all affiliated companies. The reports may also concern the BGH Group's supply chain and business partners.

#### Who can use the complaints procedure?

The complaints procedure can be used by

- Employees of the BGH Group
- Employees of our direct and indirect suppliers
- Persons who are not directly affected by risks or violations

#### How and where can reports be made?

The central channel for complaints and tips is LegalTegrity's electronic whistleblower system. This can be accessed online via the following link and can be used free of charge by whistleblowers: [Link to whistleblower channel](#)

The electronic whistleblower system allows incidents to be reported confidentially, anonymously, online or by telephone. The reporting system is independent of the IT of the BGH Group. It is therefore impossible to trace who the reporting person is.

Reports via LegalTegrity's telephone reporting channel can be submitted as follows:

Mon. - Fri.: 09:00 - 17:00  
from Germany: +49 800 3800 999  
from abroad: +49 69 99998839

#### What happens after I have submitted my report?

The Complaints Office will confirm receipt of your report within 7 days at the latest.

The Complaints Office will check whether the report falls within the scope of the complaints procedure and whether sufficient information is available for further processing. If necessary, the Complaints Office will contact you to obtain additional information.

In the event that the report does not fall within the scope of the complaints procedure, the information is insufficient, or clarification of queries is not possible, the case will be closed, and you will be informed accordingly.

Provided that the scope is given, and the information is sufficient, the Complaints Office will investigate the facts of the case. If necessary, the investigation is passed on to the relevant specialist department - always in compliance with confidentiality and avoiding conflicts of interest.

At this stage, the Complaints Office may contact you again to obtain additional information. Once the facts of the case have been clarified, follow-up measures are initiated and implemented as necessary, such as remedial and preventive measures. You will receive feedback from the Complaints Office no later than 3 months after submitting the report.

### **Who processes the reports in the electronic whistleblower system?**

The reports are processed by the following whistleblower officers:

- Vanessa Liebschner
- Fabian Wickendick
- Dr. Claus Kiehne

These employees have the necessary expertise and are independent, impartial, and sworn to secrecy in their work. This guarantees a professional handling of the reports. Other employees of the BGH group do not have access to the reports in the system.

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis as required.

### **Am I protected from discrimination?**

The BGH Group encourages its employees to raise concerns and report violations of rules under the whistleblower system. The BGH Group protects whistleblowers from any form of retaliation for making a complaint. This is part of our corporate policy.

We are committed to secrecy, confidentiality, and protection of identity - both of the whistleblowers and of the persons named in the reports - within the framework of the legal requirements.

The whistleblower system is administered online via a standardized system with a high level of data and access security. The system is technically designed in such a way that there is no possibility for the BGH Group, its employees, or the complaints office to identify the whistleblowers. Processing is carried out via external servers of a third-party provider, which are operated at a location known only to this provider and comply with the highest security class.

The Complaints Office is technically able to communicate with the whistleblowers via the system while maintaining anonymity. In this way, further necessary back and containment questions can be asked, if necessary. Whistleblowers also have the option of consciously opting out of anonymity.

Personal data is processed and deleted in accordance with applicable data protection requirements and in compliance with the LkSG and applicable whistleblower protection requirements.

### **Is there an ombudsperson?**

The ombudsperson is an employee of the BGH Group. He has the necessary expertise, is independent in his activities, impartial and bound to secrecy. The ombudsperson can be reached by e-mail, telephone and mail / in-house mail as follows.

Dr.-Ing. Claus Kiehne (Compliance Officer, Ombudsperson)

Industriestrasse 9, 57076 Siegen, Phone: +49 271 701 406, E-Mail: [compliance@bgh.de](mailto:compliance@bgh.de)

For postal reports please use the following addresses:

- In-house mail to "BGH Edelstahlwerke - Ombudsman".
- Mail to "Attn: Ombudsman, BGH Edelstahlwerke GmbH, Industriestrasse 9, D-57076 Siegen".

If you prefer to submit your report in person, please arrange an appointment via [compliance@bgh.de](mailto:compliance@bgh.de).

We would like to point out that the confidentiality of reports to the ombudsperson by telephone, mail or e-mail may be subject to technical limitations and therefore recommend using the electronic whistleblowing system in case of doubt.

These Rules of Procedure shall enter into force on 01 July 2023. They will be published on the homepage of the BGH Group and on the intranet.