

## **Rules of Procedure for the Complaints Procedure pursuant to § 8 Supply Chain Sourcing Obligations Act (LkSG)**

With these rules of procedure Näder Holding GmbH & Co. KG (hereinafter referred to as "Näder Holding") about the complaint procedure according to § 8 LkSG. The complaints procedure is a core element for the fulfillment of the human right's due diligence obligations according to the Supply Chain Due Diligence Act. It serves to give persons or groups of persons the opportunity to submit reports or complaints about human rights or environmental risks.

As an early warning system, it is used to obtain information about risks or threats to human rights in one's own business area or within the supply chain, so that it can react to them early and immediately and avert imminent damage. In addition, it provides access to appropriate remedies for affected persons if legal violations or damage have already occurred.

### **1. Who can submit complaints or information?**

The complaints procedure is available to all persons or groups of persons who are directly or indirectly affected by human rights or environmental violations in Näder Holding's own business or within Näder Holding's supply chains. This may include, for example, the following persons:

- Employees of Näder Holding
- Employees of (un)indirect suppliers and business partners
- Customers of Ottobock or its suppliers and business partners
- Relatives of employees
- Trade unions, non-governmental organizations and other organizations that become aware of risks or damage and/or support those affected by such risks or damage
- Residents at local sites

## 2. What issues can be addressed?

Affected persons can submit reports under the complaint's procedure, if they wish to provide information about human rights risks or threats. Human rights risks are situations in which it is likely that prohibited conduct in relation to one of the human rights listed below is imminent or has already occurred:

- Child labor
- Forced labor
- Forms of slavery
- Disregard of labor protection standards
- Violation of freedom of association
- Discrimination and equality of employees
- Withholding of an adequate wage
- Human rights violations through environmental degradation
- Unlawful evictions
- Violence by security forces.

In addition, reports of environmental damage can be made when such environmental damage affects natural livelihoods, for example by affecting access to or quality of food, drinking water or sanitation, or health in general. These concerns:

- Harmful soil alteration
- Water pollution
- Air pollution
- Harmful noise emission
- Excessive water consumption

In addition, independent environmental risks can also be indicated in the following cases:

- Prohibited use of mercury in manufacturing processes (as defined by the Minamata Convention on the Control of Mercury Emissions).
- Violation of the prohibition or restriction of the production and use of so-called persistent organic substances (aldrin, chlordane, DDT, endrin, heptachlor, hexachlorobenzene, mirex,

toxaphene) and industrial chemicals as well as two groups of undesirable by-products polychlorinated dibenzodioxins and dibenzofurans) (i. S. of the Stockholm Convention on Persistent Organic Pollutants)

- Violation of the requirement to minimize transboundary movements of hazardous wastes and to dispose of them in an environmentally sound manner near their place of generation (as defined in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes).

### **3. How can complaints and tips be reported?**

The whistleblowing office gives all employees, customers and business partners the opportunity to report compliance violations in order to clarify these internally and to be able to prevent future damage to persons in the company or to the company itself.

Due to the interconnectedness of Näder Holding and Ottobock, the reporting channels of Ottobock can also be used for Näder Holding. The whistleblower office consists of two channels. Information concerning Näder Holding can be submitted to Ottobock worldwide anonymously and confidentially via the whistleblower office. A digital whistleblowing portal is operated for this purpose. The website also enables encrypted communication in the event of anonymous tips.

<https://ottobock.whistleblownetwork.net/setup>

Ottobock has also appointed an external ombudsperson. The appointed lawyer examines indications of violations while maintaining confidentiality and determines the facts of the case as comprehensively as possible. He then forwards his report to the Ottobock Compliance Department.

### **4. What happens with reports and tips?**

Information about Näder Holding can be submitted anonymously and confidentially to Ottobock worldwide via the whistleblowing office. A digital whistleblowing portal is operated for this purpose. Information received via this system is reviewed by the Compliance Department for its content and forwarded to the relevant specialist department.

In addition, Näder Holding has appointed an external ombudsperson through Ottobock. The appointed lawyer examines indications of violations while maintaining confidentiality and determines the facts of the case as comprehensively as possible. He then forwards his report to the Ottobock compliance department.

If a report concerns a risk to human rights, it is relevant to the LkSG and is forwarded to the Human Rights Officer accordingly.

The human rights officer then contacts the LkSG coordinator. The coordinator will try to gather all relevant information. If possible, this will be done in contact with the person providing the information.

The person providing the information will be informed of the result of this clarification of the facts. The person providing the information also receives a message if the report was not pursued further (e.g. because the facts were already processed earlier, were already known or are not plausible). The notification also contains a statement of reasons.

Based on the findings of the clarification of the facts, the specialist department concerned draws up a proposal for remedial action. If it becomes apparent that the violation of human rights is imminent or already taking place, appropriate preventive and remedial measures are initiated without delay.

The human rights officer follows up on whether the remedial and preventive measures have been effective in ending or minimizing dangers and informs the whistleblower of this - if possible.

The human rights officer and the LkSG body are:

- Impartial
- Independent and not bound by instructions in the performance of their duties
- Free from conflicts of interest
- Appropriately trained for the task
- Qualified regarding the potential content of complaints

Provided with sufficient time resources to process tips and complaints in a timely manner and to understand the point of view of the person making the tip.

### **5. How are whistleblowers protected?**

From the beginning of the process and, if possible, beyond, measures are taken to protect whistleblowers from disadvantage or punishment resulting from the submission of a tip:

- All tips will be kept strictly confidential.
- Names, personal data or other information that could lead to conclusions about the identity of the person providing the tip are protected and not passed on to persons outside the specialist department.
- The responsible persons are trained and sensitized for handling confidential facts and data.
- If necessary, names are anonymized or pseudonymized to protect the person providing the information.
- The processing of reports and communication with persons providing information takes place in a protected environment, in such a way that third parties cannot access documents, listen in on conversations or otherwise obtain information.
  
- Even after the conclusion of the proceedings, no information is disclosed if this is necessary to protect the person.
  
- As far as possible, the specialist department will maintain contact with the whistleblowers throughout the proceedings and give them the opportunity to report any threats or disadvantages.