



Rules of Procedure for Complaints

As an internationally active family-owned company with more than 150 years of tradition, we at Windmüller & Hölscher feel committed to a value-oriented corporate leadership. Trust, openness and optimism shape our actions. In addition to complying with legal regulations, the warnings of internationally recognized human rights and environmental protection are an elementary component of our business ethics.

The implementation of an effective complaint procedure is an important tool for identifying violations of obligations and risks as well as the initiation of countermeasures. The following rules of procedure apply to Windmüller & Hölscher KG, Garant Maschinenhandel GmbH, Exakt Maschinenbau GmbH & Co. KG as well as Windmüller & Hölscher Academy GmbH and provide the essential information on the implemented complaint procedure.

1. Purpose

With the lead-in of the complaint procedure, all internal and external individuals or groups of individuals can report possible breaches of laws and/or regulations, including breaches of human rights and environmental obligations, as well as related suspicions. In this context, all notes on violations and risks arising from your own business or in the global supply chain of Windmüller & Hölscher are relevant.

2. Complaint channels

Complaints can be submitted via the following complaint channels:

- Windmüller & Hölscher provides an electronic information system in German and English. The system is free and accessible 24/7 at the following link: <https://whgroup.vispato.com/>
- Complaints can also be sent by letter to the following address:

Windmüller & Hölscher KG
Head Of Corporate Governance
Münsterstraße 50
49525 Lengerich

3. Protection of whistleblowers

The protection of whistleblowers from reprisals is an elementary component of the complaint process. Any discrimination against whistleblowers in connection with their note is strictly prohibited and constitutes a serious breach of duty under employment law. Accordingly, retaliatory measures against whistleblowers who have submitted a complaint to Windmüller & Hölscher in good faith will not be tolerated and will be followed up consistently. Any discrimination, intimidation or other retaliatory measures must be filed immediately via the mentioned complaint channels.

This guard also applies at Windmüller & Hölscher to the rights of persons who are accused of a violation in the context of a complaint. Until proven otherwise in the course of the proceedings, the presumption of innocence applies. A deliberate false message with the aim of harming another person by knowingly specifying erroneous information constitutes an abuse of the complaint procedure and will not be tolerated.

In general whistleblowers can send a message both anonymously and under specification of the personal data. The relevant decision rests solely with the informant. The incoming notes are processed exclusively by selected and specially trained employees of Windmüller & Hölscher and/or the respective company concerned (complaints office). These employees are impartial, independent and not bound by instructions and are obliged to maintain confidentiality.

4. Data protection & information security

In the event of a report by a whistleblower and the naming of one or more accused persons, personal data within the meaning of the General Data Protection Regulation may be processed. The whistleblower and the accused have the right to confidential treatment of their data. Compliance with data protection regulations is ensured in all of the aforementioned complaint channels. The exercise of data subject rights in accordance with Chapter 3 GDPR is only possible to a limited extent. This serves to protect the whistleblower from abusive use of data subject rights.

Communication conducted via the electronic whistleblower system is encrypted and decrypted directly in your browser. This is known as end-to-end encryption, which ensures that only the persons involved can read the content. This means that even the provider of the whistleblowing system has no access to the corresponding communication. The application is hosted exclusively in an ISO 27001-certified data center in Germany.

Reports and related documentation are generally subject to a retention period of 3 years. Further storage is permitted in individual cases until it is no longer necessary. Unfounded information or information not covered by the purpose of the whistleblowing system must be deleted after verification.

5. Complaint procedure

Upon receipt of a complaint, the notifying person shall receive an acknowledgement of receipt within seven days. In connection, a central screening is carried out first to ascertain whether the present note constitutes a breach of duty or a corresponding risk and whether sufficient information is available to clarify the facts. If the information transmitted is not sufficient, the complaints office will, if possible, contact the person giving the information in order to inquire about the necessary details of the complaint.

In the electronic whistleblower system, a secure mailbox is created when a complaint is sent, which enables contact in the case of an anonymous note while preserving the anonymity of the whistleblower.

The investigation of the facts is initially carried out by the complaint point. If necessary, other competent authorities (e.g. within the company) will be involved during this investigation while respecting confidentiality and data protection. After finalizing the processing of the facts, the informing person must be notified in writing of the outcome of the internal investigation. A period of three months from the receipt of the complaint generally applies in this regard. Should the duration of the complaint procedure in individual cases, e.g. due to the complexity of the case, take longer than three months, the informing person must be informed by the complaints office accordingly before expiration of this deadline.

If the reported breach of obligations or a related risk is confirmed during the internal investigation, a proposal for a solution including suitable preventive or remedial measures will be prepared immediately. In the future, the complaints office will monitor whether and to what extent the defined measures are being implemented.

6. Checking the effectiveness of the complaint procedure

The effectiveness of the complaint procedure is reviewed at least once a year and whenever there is a significant change in the company's risk situation, such as the introduction of new products or a new business segment.