

## **Procedure regarding the Grievance Mechanism according to § 8 German Supply Chain Act**

Vitesco Technologies takes responsibility for respecting and promoting internationally recognized human rights within its own business units and through appropriate management of its supply chains. Vitesco Technologies Group AG and its companies implement and comply with all requirements of the German Supply Chain Act (LkSG) including the obligations with respect to human rights and environmental due diligence. An essential core element of these due diligence obligations is the establishment of an effective grievance mechanism, through which reports on human rights and environmental risks or violations can be made.

The below rules of procedure provide the information on the main features of the grievance mechanism, how to access it, and related responsibilities. Furthermore, it also provides information on what happens with incoming reports and complaints, i.e. how the grievance mechanism is carried out. It is important for Vitesco Technologies Group AG and its companies to present this information in an understandable and comprehensible manner and to maintain transparency about the process.

### **What is the purpose of the grievance mechanism?**

The purpose of the grievance mechanism is to provide any person or group of persons with the opportunity to submit relevant complaints or information to Vitesco Technologies Group AG and its companies and thus to draw attention to human rights and environmental risks (**early-warning system**).

Persons or groups of persons are also given the opportunity to provide information about suspected violations of law, so that damage can be averted or minimized immediately (**access to appropriate remedy**).

### **Who is the grievance mechanism aimed at? Who can submit complaints or reports?**

Any person may submit complaints and reports, regardless of whether this occurs in Germany or abroad, and regardless of whether this person works for Vitesco Technologies, a third party or is self-employed.

### **What types of reports or complaints can be filed?**

The grievance mechanism allows individuals to report any suspicion of a given or potential wrongdoing that may affect the whistleblower, the Vitesco Technologies Group or any other people or companies. In particular, this includes human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen from the economic activities of Vitesco Technologies Group AG and its companies in their own business or in the supply chain.

### **How can I submit complaints or reports?**

Complaints and reports can be submitted at any time in two different ways. All complaints and reports, regardless of the way in which they are received by Vitesco Technologies Group AG and its companies, are processed immediately and in the same way.

- › Vitesco Technologies Group AG provides an electronic whistleblowing system - the Integrity Line - in which complaints or reports can be entered into a web form. The system can be used in 12 languages and accessed at <https://vitesco-technologies.integrityline.org/>
- › Vitesco Technologies has also established a network of Regional Compliance Officers and Compliance Champions at each site. Vitesco Technologies employees are free to contact these individuals in person, by email or by any other means to share their concerns. All reports submitted through the Compliance Officers and Compliance Champions will also be included in the whistleblowing system referenced above and processed.

Complaint and report processing through the whistleblower system ensures that the information is handled confidentially. The whistleblowing system enables setting up a mailbox through which the whistleblower can communicate with Vitesco Technologies Group AG and its companies under confidentiality of his/her identity.

### **Who handles the complaints and reports?**

The complaints and reports are received by Vitesco Technologies Internal Audit and the Compliance Department for further processing. All employees responsible for processing have the following characteristics.

They are:

- › impartial
- › independent
- › not bound by instructions
- › bound to secrecy
- › appropriately trained
- › equipped with sufficient time resources

### **What are the steps of the grievance mechanism?**

- › After a complaint or a report has reached the whistleblower system, the whistleblower receives a receipt confirmation. This confirmation is usually provided within the next 48 hours, but not later than within one week.
- › During the entire process, Vitesco Technologies Group AG and its companies will be in contact with the whistleblower, as far as necessary in a specific case and a contact opportunity exists.
- › Upon receipt, the complaints and the reports are assessed on the group level. The assessment aims to determine whether the reported facts contain indications for a law violation, *inter alia* regarding a violation of the German Supply Chain Act with respect to a violation of human rights or environmental duties. A part of that assessment is also whether the investigation is to be carried out centrally or at the level of a local company.
- › The next step is to clarify the facts, which is done as promptly as possible. The measures initiated and the overall progress of all open cases are generally reviewed on a weekly basis in a joint regular meeting of Internal Audit, the Compliance Department and Group Security of Vitesco Technologies.
- › If, while clarifying the facts, it is determined that a violation of human rights and/or environmental obligations is imminent or already taking place, remedial measures are initiated without delay.
- › The employees involved in the fact investigations follow up on whether and to what extent the remedial measures are implemented. In addition, a proposal for further actions is prepared on the basis of the findings.
- › As soon as all specific risks have been mitigated and the consequences of the investigated facts for all parties involved have been determined, a case report is prepared. Internal Audit, the Compliance Department and Group Security review the content of the case report and approve it or agree on further risk mitigating measures, if necessary. For cases assigned to local Vitesco Technologies companies, a review of the identified facts and follow-up measures also take place at the group level.

### **How are the whistleblowers protected from any retaliation measures?**

Protecting whistleblowers from retaliation measures is an important part of our grievance mechanism.

The following measures are in place:

- › All complaints and reports are processed only by a small group of selected and specially trained employees.
- › All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, is treated confidentially. This applies also after the investigation process has been concluded.
- › The Company's internal documentation is kept in accordance with legal requirements and then destroyed.
- › Vitesco Technologies Group AG and its companies protect whistleblowers from any retaliation that might result from submitting complaint or report.