

Rules of Procedure for the
Complaints Procedure of the ebm-
papst Group i.a.w. § 8 para. 2 LkSG
(German Supply Chain Act)

ebmpapst

engineering a better life



Establishment and purpose

Compliance with laws, rules and internal regulations is a top priority at ebm-papst which is validated through appropriate measures as part of our risk compliance management system. Despite extensive efforts, breaches of rules by individuals may sometimes not be prevented. Dealing openly with misdemeanours and mistakes helps to identify necessary steps and measures at an early stage in order to prevent damage to ebm-papst, its employees and other third parties involved.

The complaints procedure is available to all employees and business partners of the ebm-papst Group and any other person to report violations of legal requirements and internal organisational rules or the suspicion of such violations. It also makes it possible to draw attention to human rights and environmental risks and violations of human rights or environmental obligations that have arisen as a result of ebm-papst's business activities in its own business area, our business partners or suppliers in the supply chains. These include, for example, the prohibition of slavery, child and forced labour, compliance with occupational health and safety regulations, the payment of appropriate wages and the prevention of air, soil and water pollution.

Where there is a suspicion of possible misconduct – for example a violation of statutory regulations or our Code of Conduct – a report can be submitted around the clock and from any location via our comprehensive web-based whistleblower system at <https://ebmpapst.integrityline.app>. The report can also be submitted anonymously if desired. It goes without saying that no adverse consequences need to be expected in any case following the submission of a report made in good faith.

The web-based whistleblower system, which is available in 13 languages, offers a simple forum to make it as easy as possible for the whistleblower to report their concerns and offers predefined reporting priorities to assist in reporting. Alternatively, it is also possible for the whistleblower to contact the local management, or its nominated Compliance Officer, or the Vice President Group Compliance via phone, e-mail or personally. The current contact details of the Vice President Group Compliance can be found on our website at <https://www.ebmpapst.com/de/en/company/compliance.html>.

Complaints Procedure

The Corporate Center Corporate Governance (CCCG) will follow up on all information with utmost confidentiality, protect the identity of the whistleblower. Only the persons required to process the report will be involved. Where contact details are voluntarily given, receipt of the information will immediately, but at least within seven days, be acknowledged to the person providing the information by the CCCG. All allegations will be mutually discussed, including the relevant expectations of the next steps, timescales and potential outcomes. If further questions arise, the CCCG will contact the whistleblower. Communication with the whistleblower therefore takes place via the CCCG.

After one month, the CCCG will provide initial feedback to the whistleblower. This feedback may be final if the procedure has already been completed, or it may contain information on the interim status of processing. In cases where the processing is more extensive, the whistleblower will be informed after one month of any necessary extension of the processing time. After three months at the latest,

the whistleblower will receive further feedback from the CCCG on the status of the report and any resulting measures, insofar as legally permissible and possible (by providing contact information). The whistleblower may contact the CCCG at any time to obtain information on the status of the investigation.

The persons authorised to process cases take all reports seriously and check whether and to what extent there may be a violation of legal requirements or internal organisational rules. The persons entrusted with processing the case are obliged to process the information impartially, in particular independently and without being bound by instructions, and to respect confidentiality. Efforts are being made to provide a timely clarification of the allegations, taking into account the interests of all parties involved. Other experts will be involved where appropriate, whereby confidentiality and the protection of the identity of the whistleblower will also be guaranteed in this case. Should this be necessary, further investigation will be taken by experts or the relevant departments. Investigation of the facts takes place quickly, strictly confidential and without major interruptions. Progress of the investigation, including the assessment of the case and the implementation of measures is recorded and monitored in a central confidential database.

Any individual or individuals under investigation will be treated fairly, lawfully and with respect at all times. Furthermore, all individuals under investigation will be presumed innocent and will be granted the right to be heard. All individuals under investigation will be informed about the allegations as soon as possible, at which time they will be advised of their rights for information and correction under the process. In exceptional cases there may be a serious risk that the notification would jeopardise the investigation, or the whistleblower could potentially be disadvantaged or even punished. In this cases such notification may be omitted or postponed until the investigation has been concluded.

Legal assessment of the allegations and evidence as well as the determination of appropriate and suitable preventive and remedial measures are an essential part of the complaints procedure and are managed by the Vice President Group Compliance in close coordination with the Corporate Center Legal, the Executive Management Board and the relevant nominated experts and departments. Depending on the facts of the case and the outcome, civil action, involvement of the relevant authority and/or appropriate compensation measures may be necessary, for example. Even if the investigation does not determine a breach, changes and alterations of internal processes may still be initiated. The Compliance Officers monitor the implementation of the measures taken.

All Compliance Officers as well as the employees of the CCCG are qualified to receive and/or to process cases and are distinguished by their high level of professional expertise and neutrality whilst observing strict confidentiality.

Protection of the whistleblower

The protection of the whistleblower is of particular importance throughout the entire whistleblowing process. It is mandatory that the whistleblower will be fully protected from discrimination and disciplinary action, and that their identity will remain confidential. ebm-papst does not tolerate any retaliatory measures (in particular discrimination, punishment, labour law measures, etc.) against persons who have submitted a report responsibly and in good faith. The whistleblower is protected from discriminatory and/or disciplinary measures. However, should there be any indication that the whistleblower is disadvantaged as a result of the provision of evidence or is in any way hindered in providing evidence, this will be vigorously pursued as an independent matter and serious misconduct, resulting in enforcement action where appropriate. The prohibition of retaliatory measures does not apply if reporting is done abusively, or maliciously incorrect information is reported.

To support open communication, we encourage the reporting person to provide their name when providing evidence. All information is treated confidentially. Nevertheless, it is always possible to report anonymously within our web-based whistleblowing system. By setting up their own secured postbox, the whistleblower can maintain anonymous contact with the CCCG, ask questions and be informed about the progress of their whistleblowing. If the whistleblower does not wish to disclose their contact details, this will not have any effect on the whistleblowing process. However, if contact details are provided, the investigation of evidence is often streamlined through further inquiry.

Data protection

Compliance with the provisions of data protection law and all its statutory obligations is mandatory. The collected personal data is limited to the identity, function and contact information of the whistleblower, including those individuals that may be affected by their evidence. Further information on data protection and the handling of personal data can be found in the data protection information of the web-based whistleblowing system.

All personal data stored at ebm-papst as a component of the given report and of the investigation will be deleted after completion of the investigation when this personal data is no longer required. In exceptional circumstances some personal data may need to be retained. For example, in the context of disciplinary or court proceedings, unless ebm-papst has a legitimate interest or the preservation is required by law.

Effectiveness of the Complaints Procedure

In order to assess the effectiveness of the complaints procedure, appropriate measures will be taken all often as necessary as determined by events arising, and at least annually. Where a change in the risk is observed within the company's own business divisions or at direct suppliers, e.g. with the introduction of new products, projects or business areas, appropriate measures will be taken. The effectiveness of the complaints procedure at ebm-papst is measured using the criteria and key questions recommended by the German Federal Office for Economic Affairs and Export Control (as of November 2023). These criteria are the effectiveness criteria of the UN Guiding Principles.

In addition to these criteria and key questions, corresponding key performance indicators (KPIs) are provided to identify and analyse developments, as recommended in the Federal Office's guidance on the complaints procedure. If necessary, the complaints procedure will be adapted accordingly.

To improve the complaints procedure, the CCCG also contacts the whistleblower directly after processing the respective compliance report, if possible by provided contact information. In this way, experiences with the complaints procedure can be determined and potential for improvement identified. This feedback is intended to make the complaints procedure as targeted as possible. In particular, the accessibility of the procedure should be improved in this way.

In addition, findings from the complaints procedure are taken into account in the risk analysis, as well as in the review of the policy statement and, if necessary, its further development. Conversely, the results of the risk analysis of potential target groups are taken into account appropriately in the further development of the complaints procedure.

ebm-papst places particular focus on communication enabling all employees, business partners, suppliers and other third parties to be aware of the complaints procedure. As part of our compliance management system, we communicate regularly and thus achieve an increased awareness of compliance issues and our complaints procedure.

Our direct suppliers are in an appropriate manner obligated to best practice compliance principles so that we can always maintain the importance of compliance and socially recognised standards throughout the value chain and – where necessary – take immediate remedial measures in the event of violations.