

Rules of Procedure pursuant to Section 8 (2) of the German Supply Chain Due Diligence Act (LkSG)

1. Establishment and purpose of the grievance procedure

The Hörmann Group has established an appropriate grievance procedure pursuant to Section 8 of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG). The grievance procedure enables individuals to report human rights and environmental risks as well as breaches of human rights-related or environmental obligations caused by the economic activities of a company in its own business sector or of a direct or indirect supplier.

2. Responsibility and accessibility

The grievance procedure is handled by our external lawyer of trust (ombudsman), who can be contacted in the following way:

Dr. Carsten Thiel von Herff, LL.M.

Loebellstraße 4
33602 Bielefeld
Germany

Fon: +49 521 557 333 0

E-Mail: vertrauensanwalt@thielvonherff.de

Reporting platform: <https://report-tvh.com/>

Homepage: <https://thielvonherff.com/>

The external lawyer of trust will act as a self-employed and independent lawyer. He is impartial and not bound by any directives from the Hörmann Group with regard to the substantive treatment of the facts. The external lawyer of trust is bound to secrecy. If requested, he shall keep the identity of a whistleblower confidential.

3. Grievance procedure

The external lawyer of trust records the grievance and, if necessary, discusses the facts of the case with the whistleblower. In all cases, the whistleblower will receive an acknowledgement of receipt. The external lawyer of trust assesses whether there may have been a breach of duty as defined in the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) or a breach of other laws or internal regulations. If there are sufficient grounds for doing so, he will pass on the information in an appropriate format to the relevant individuals within the Hörmann Group for investigation. The external lawyer of trust does not conduct investigations himself so as not to compromise his impartiality.

The Hörmann Group shall deal with the information in the report in compliance with the law and internal regulations, while also taking into account the interests of all parties involved. The investigation should be carried out quickly and without major interruptions.

Any individuals who are affected by an investigation must be treated fairly and with respect. Presumption of innocence applies to all affected parties. The right to be heard must be granted. Therefore, the parties affected by a report will be informed about the report as soon as possible and advised of their rights to information and rectification. However, where there is a serious risk that notifying the affected parties would jeopardise the investigation into the report, such

notification may be delayed until after the investigation has been completed or until the risk has ceased to exist.

The Hörmann Group shall carry out the legal assessment of the facts under investigation and determine suitable measures to eliminate and prevent improper business practices and may consult the external lawyer of trust to this end. Measures may include, for example, appropriate civil action or the involvement of an authority. Even if no breaches are identified in a specific case, proposals for changes to work and business processes as well as changes to organisational and behavioural rules may be called for.

The whistleblower may contact the external lawyer of trust at any time for an update on the state of affairs. The whistleblower will receive feedback on the follow-up measures taken in relation to their report three months after the report is submitted. Upon completion of the process, at the latest, the whistleblower will be informed of the outcome by the external lawyer of trust to the extent legally permissible.

4. Protection for the whistleblower

As a matter of principle, the whistleblower is protected from discriminatory or disciplinary measures. Any act of retaliation against whistleblowers will not be tolerated. If there is any indication of retaliation against a whistleblower, the external lawyer of trust must be called in immediately. If the external lawyer of trust has undertaken to maintain a whistleblower's confidentiality, he will not disclose the whistleblower's name and identity to the Hörmann Group or any third party without the whistleblower's consent. Should the external lawyer of trust be questioned as a witness in criminal, civil or other proceedings, he will only disclose the name and identity of the whistleblower if he is given written consent to do so by both the whistleblower and the Hörmann Group.

In disclosing the facts, the whistleblower's desire to protect his or her identity is opposed by the interests of those affected by the report. This is another reason why deliberate abuse of the opportunity to submit grievances and reports will not be tolerated. The external lawyer of trust will inform the whistleblower in the first meeting that his or her identity may be disclosed to the Hörmann Group in the event of deliberate abuse of the grievance procedure.

5. Data protection

The external lawyer of trust ensures compliance with the statutory retention obligations and the provisions of data protection law. The personal data collected is limited to information on the identity, function and contact details of the whistleblowers and affected parties, as well as to other personal data that is absolutely necessary for dealing with the matter. In addition, only reported facts, processing details, follow-ups on the report and investigation reports are kept on file.

For personal data recorded in the course of the whistleblowing process and investigations, the retention period is two months after the investigations have been completed. This period shall be extended accordingly if the investigation is followed by disciplinary or judicial proceedings or other disputes for which the data must be used.

6. Effectiveness of the grievance procedure

The effectiveness of the grievance procedure is reviewed by the Hörmann Group once a year as well as on an ad hoc basis, for example if there is reason to believe that the risk situation in the Hörmann Group's own area of business or that of its direct supplier will change or increase significantly, for instance as a result of new products, projects or a new business segment being launched.