

**Rules of procedure for the complaints procedure pursuant to
§ Section 8 of the German Supply Chain Due Diligence Act (LkSG)**

The companies of the GHD GesundHeits GmbH Deutschland Group (hereinafter referred to individually and collectively as GHD) are aware of their social, ethical and environmental responsibility in their business areas and the entire supply chain. Accordingly, we have established an effective complaints procedure through which information on human rights and environmental risks or violations can be submitted. The aim is to become aware of grievances in the supply chain at an early stage, to rectify them - where possible in dialog with those involved - and to develop and implement effective preventive measures.

1. Types of information and complaints

In the complaints procedure, both employees and external persons and organizations (hereinafter referred to as "complainant") can inform us of human rights and environmental risks and violations of human rights and environmental obligations that have occurred in our business area or along our supply chain. The complaint should be fact-based and the complainant should be able to provide sufficient information regarding the risk or violation. There should be a link to GHD or our supply chain.

2. Complaint channels

Reports and complaints can be submitted via the following channels:

- By E-Mail to:
beschwerdestelle-ghd@posteo.de
- By post to:
GHD GesundHeits GmbH Deutschland
Beschwerdestelle LkSG
Gotenstraße 10
20097 Hamburg

3. Confidentiality and impartiality

We treat incoming information and complaints confidentially. When receiving, forwarding and processing information, we protect the identity of the person making the complaint and other persons involved in accordance with data protection regulations. The identity will only be disclosed to third parties to the extent that this is absolutely necessary for the investigation and follow-up of the report or if this is required by applicable law in the context of investigations by national authorities or court proceedings.

The complaints office is staffed by lawyers from the GHD legal department who have the necessary expertise. They are impartial, independent in the performance of their duties, not bound by instructions and obliged to maintain confidentiality. They are also obliged to comply with data protection regulations and to protect the rights of both the person making the complaint and other affected persons.

4. Dealing with information and complaints

The GHD protects the complainant from discrimination or punishment on the basis of a complaint.

5. Course of the procedure

a. Receipt of the complaint

Once a complaint has been received, its receipt will be documented internally and the complainant will receive confirmation of receipt within one week (if contact details have been provided).

b. Examination of the complaint

The Complaints Office first checks whether there is sufficient information to examine and investigate the reported facts. If this is not the case, the complaints office will, if possible, contact the complainant to request further information. If neither sufficient information is available nor is it possible to make contact, the case will be closed.

c. Clarification of the facts

The complaints office examines the complaint. The facts of the case are examined on a case-by-case basis using the following criteria, among others:

- ❖ Severity of the potential violation / risk
- ❖ Verifiability of the incident
- ❖ Connection to GHD or our supply chain
- ❖ Contribution of the GHD to the causation
- ❖ Individual case or systemic grievance
- ❖ Possibility of influencing remedial action and prevention

The facts of the case are discussed with the person making the complaint. If necessary, external help is sought, e.g. from local forces or service providers. The accused person is asked to comment if the person making the complaint has not ruled this out. The more detailed the information on the complaint is, the sooner the case can be resolved. The following information is therefore required to investigate the complaint:

- ❖ Exact description of the complaint:
 - Date of the incident
 - Name and position of the person making the complaint (if anonymity has not been chosen)
 - Name and address of the accused person or company
 - Description of the violation of the Code of Conduct of the GHD Group, the human rights standard or the environmental standard
- ❖ Reference to GHD

- ❖ Evidence to substantiate the complaint

Where possible, the person making the complaint is actively involved in examining the facts of the case. The complaints office informs the complainant immediately of the outcome of the investigation of the facts and gives reasons for rejecting the complaint.

d. Development of a solution

If, in the opinion of the complaints office or the responsible body, the investigation confirms human rights and environmental risks or violations of human rights or environmental obligations in its own business area and at suppliers, a proposal for further action (in particular preventive and remedial measures) is drawn up. Where possible and appropriate, the complainant will be involved in this process.

e. Implementation and follow-up

Finally, the implementation of the proposed solution is followed up by the complaints office or the responsible office.

f. Conclusion of the procedure

The person making the complaint will be informed of the conclusion of the complaints procedure, provided that contact can be made.

The processing time is highly case-dependent and can therefore take anywhere from a few days to several months. However, we endeavor to conclude the investigation in a timely manner.

Status: December 2023