



Complaint and reporting procedure regulation

[Act on Corporate Due Diligence in Supply Chains]

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Preface

From January 1, 2024, BHS Corrugated is obliged to implement the regulations of the German Supply Chain Due Diligence Act. This obliges us to implement certain due diligence measures to ensure that both our own business activities and the supply chain are responsible in terms of human and environmental rights. Potentially affected persons must therefore be provided with effective and transparent reporting channels internally and externally to submit complaints and reports.

All reports and complaints made must be handled in a fair and transparent manner. This applies to us and our suppliers worldwide to ensure fair, safe, and healthy working conditions in the global supply chain.

To ensure this, we would like to be informed about illegal behavior in our company to be able to clarify and stop such behavior. The main goal is to protect us and the company against potential (liability) risks and financial damages.

Complaint and reporting procedure regulations

1. Does BHS Corrugated have a company-wide procedure?

BHS Corrugated has a company-wide, transparent, public, barrier-free, and uniform complaint and reporting procedure. All complaints will be treated equally. We want to fulfill our obligation to protect human rights and ensure environmental protection. We regularly check compliance with our standards and strive to improve them. Our company-wide complaint process enables us to identify and counteract human rights and environmental violations and risks along our supply chain.

2. Who can submit complaints and reports?

The complaint and reporting channel is accessible to everyone, i.e., anyone can submit a report or complaint.

3. What reports can be submitted?

Actual or suspected violations of laws and internal regulations, including human rights and environmental risks (see § 2 LkSG) as well as our code of conduct, can be reported. This does not include general complaints. Please only submit complaints and reports if you are convinced that they are correct.

4. Will my identity be kept confidential?

Yes, your identity will be kept confidential. All complaints and reports are reviewed confidentially and can also be submitted anonymously.

It is important to us that those who report incidents are protected. Therefore, confidential data may only be disclosed if necessary and legally permissible.

5. Are there any consequences if I report an incident?

No, by reporting you are helping us to clarify and eliminate misconduct and grievances. All information will be processed confidentially and within the framework of applicable laws.

You must only expect consequences if you claim untrue facts about other people against your better knowledge.

If you believe that consequences have been taken against you or you have been disadvantaged as a result of the complaint, please inform us immediately using one of our reporting channels provided.

6. Process of the complaint procedure

The complaint procedure follows the following pattern:

a) Receipt of a report or complaint

When you submit a report or complaint, you will receive confirmation of receipt within 7 days at the latest.

b) Examination procedure

During the first review process, an assessment is made as to whether the facts presented reveal a risk to human or environmental law or whether there are other violations.

It will also be analyzed whether there is sufficient information for further investigation. If this is not the case, the whistleblower should be contacted, if possible, or the missing information must be obtained elsewhere.

If this is not possible or there are further gaps, the report or complaint will not be accepted and the complainant will be informed of this, stating the reasons.

c) Clarification of the matter

If a complaint is accepted, it will be forwarded to either the department responsible for the individual case or to the Compliance Office. The responsible employees are trained to carry out this test, are independent of instructions, and are obliged to act impartially and to maintain confidentiality.

As the review progresses, the matter will be discussed, also in collaboration with the complainant, and possible preventive and remedial measures will be decided.

d) Prevention and remedial measures

If the examination of a complaint or report reveals a risk to human or environmental rights or a breach of duty, appropriate remedial action will be taken.

If desired by the complainant, alternative dispute resolution methods may also be used. In this case, a neutral third party acting as a mediator could potentially be used to reach an amicable solution during mediation. This would then take place instead of the official complaint procedure. However, it is still possible to initiate an official complaint procedure even after mediation has been completed.

e) Completion of the procedure

The complainant should be informed about the completion of the examination and receive a brief overview of the results of the examination. In addition, it is the responsibility of the responsible department or the Compliance Office to monitor the implementation and compliance with the agreed prevention and remedial measures.

f) Monitoring

The complaint process is usually monitored and reviewed once a year or on an ad-hoc basis if there are indications of possible violations or vulnerabilities.

7. Content of the complaint

You can provide us with the following (voluntary) information to help us process and resolve your complaint effectively and emphatically.

a) Contact details

Name and contact details of the complainant and, if different, the person concerned. An anonymous report is also possible. Here you give us feedback as to whether we can use your data confidentially or transparently.

b) Employer

Name of the affected department / employer.

c) Workplace

Information regarding the workplace including the specific location of the production facility.

d) Possible violation

Specify the human rights or environmental violation or breach of duty.

e) Scope of the breach

How many people are affected and how serious is the breach or negative impact.

f) Your own comments

What would you do as a complainant to remedy the situation.

g) Parallel proceedings

It is also questionable whether a formal complaint has already been submitted to the company or whether alternative dispute resolution options (e.g., mediation, arbitration) or legal proceedings have been initiated.

h) History

Has this issue been presented in the past or have other organizations or local and international authorities been informed?

8. Contact person for the respective reporting channels

Suggestions and complaints, in particular references to gross violations of applicable law, our code of conduct or guidelines within the BHS World, can be reported to the following channels or people (in person, electronically, in writing or by telephone):

a) Responsible line manager

- this reporting channel is only available to employees of BHS Corrugated

b) Works Council

- this reporting channel is only available to employees of BHS Corrugated

c) Compliance Office

- compliance@bhs-world.com

d) Anonymous whistleblower platform:

- Link to go to Integrity Channel BHS Corrugated:

[>>> Link "Integrity Channel BHS Corrugated"](#)

- Scanning QR-code to go to Integrity Channel BHS Corrugated:



Access to the channels is open at any time. Processing usually takes place on weekdays from 9 a.m. to 5 p.m.

In addition to the internal reporting channels, you also have the option of contacting the external authority responsible for the individual case (e.g., Federal Office of Justice) with your complaint or report.