

Rules for complaints and reporting procedures

with regard to our obligations under the
German Supply Chain Due Diligence Act (LkSG)



Rules for complaints and reporting procedures

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To keep this text clear and to improve readability, any and all references to persons or groups of persons should be regarded as applying to all genders. The term “colleague” also includes managers at all levels and members of executive bodies.

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Foreword

From January 1, 2023 onward, SEW-EURODRIVE GmbH and Co KG (hereinafter referred to as SEW-EURODRIVE) has been obliged to implement the regulations of the German Supply Chain Due Diligence Act (LkSG). This act obliges SEW-EURODRIVE to undertake certain due diligence measures to ensure that its own business activities and its supply chain are handled responsibly with regard to human rights and environmental concerns.

Why is SEW-EURODRIVE publishing a complaints procedure, and how does it work?

The German Supply Chain Due Diligence Act imposes certain requirements in connection with the complaints procedure. In short, it obliges SEW-EURODRIVE to provide effective and accessible opportunities for potentially affected individuals within the company and outside, in order to submit their complaints. All complaints must be handled in a fair and transparent manner. The German Supply Chain Due Diligence Act is not limited to SEW-EURODRIVE's business activities in Germany, but applies to us and the company's suppliers worldwide. In addition, the German Supply Chain Due Diligence Act obliges SEW-EURODRIVE to make its rules for the complaints procedure publicly accessible.

In this document, the rules for complaint procedures, we explain precisely how the complaints procedure works.

Bruchsal, March 01, 2024

SEW-EURODRIVE GmbH & Co KG
The Officer for Human Rights

These rules for complaint procedures apply to SEW-EURODRIVE GmbH and Co KG, and all its affiliated companies within the meaning of Section 15 of the German Stock Corporation Act.

Rules for complaints and reporting procedures

1. Does SEW-EURODRIVE have a company-wide procedure?

Yes. SEW-EURODRIVE operates a company-wide, transparent, public and accessible, standardized complaints and reporting procedure. All complaints and reports from colleagues or third parties are treated equally – insofar as this is permitted by law.

2. Who can submit complaints and reports?

Anyone. The complaints and reporting procedure is accessible to everyone. Not only colleagues, but also persons and organizations outside SEW-EURODRIVE can submit complaints and reports here.

3. What can I report?

Any suspicion of an actual or potential violation of laws or internal regulations – including human rights and environmental risks or obligations.

The suspicion may be directed either against individual SEW-EURODRIVE colleagues or in connection with an SEW-EURODRIVE business or an SEW-EURODRIVE supplier. Please only submit complaints or reports if you are convinced that they are correct.

4. Do I have various possibilities for submitting complaints or reports?

Yes. SEW-EURODRIVE has various reporting channels that you can use for complaints or reports.

Our whistleblower hotline is available 24 hours a day, seven days a week. You can use it to submit complaints or reports. You can do this in writing or by telephone – and you don't even have to give your name if you do not wish to do so.

The whistleblower hotline is available in over 90 different languages, and is managed by an independent operator. The data is stored on secure servers in Germany. The content of the reports is processed exclusively by SEW-EURODRIVE.

If you prefer to contact someone directly at SEW-EURODRIVE, please speak to one of our Compliance Officers. However, all other Legal & Compliance colleagues, SEW managers, HR managers, workforce representatives and, of course, SEW-EURODRIVE's Chief Compliance Officer are also available for you.

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5. Who will deal with my complaint or report?

As a first step, complaints and reports are received by SEW-EURODRIVE's Chief Compliance Officer. The Chief Compliance Officer then decides on how the investigation should be conducted further. He/she may involve individual departments with particular expertise, as long as this does not jeopardize the success of the investigation or the confidentiality of the report or complaint. At his/her own discretion, the Chief Compliance Officer may also inform SEW-EURODRIVE's management about the complaint or report, and obtain their decision on how to proceed. The Chief Compliance Officer is impartial, a trained specialist and subject to a special duty of confidentiality.

The company will contact you to clarify any open questions. We will discuss your complaint with you if the German Supply Chain Due Diligence Act (LkSG) obliges us to do so. Of course, this is only possible if we can contact you.

6. Will my identity be treated in confidence?

Yes. All complaints and reports will of course be treated in confidence, and can also be submitted without you giving your name. It is particularly important for SEW-EURODRIVE for your matter to be dealt with confidentially, and we will protect you as the whistleblower! Confidential data is only allowed to be passed on if this is necessary and legal. Our managers are also obliged to forward reports received to our reporting office in confidence.

7. Will I be notified that my complaint or report is being processed?

Yes. You will receive a confirmation of receipt from SEW-EURODRIVE as soon it has received your complaint or report – but within 7 days at the latest.

8. Are all complaints and reports investigated?

Yes. We take every complaint and report that reaches us seriously. The reporting office checks whether the complaint or report contains sufficient information to warrant further investigation. If the reporting office requires further information, it will contact you if this is possible.

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9. What will happen to my complaint or report once it has been investigated?

Possible courses of action: As soon as the complaint or report has been investigated, the reporting office can forward the matter to another responsible department within the company for processing and clarification, or to a competent authority.

The reporting office can also deal with the complaint or report itself. If an in-house investigation is required, an investigation mandate will be issued for this purpose. During the investigation, the reporting office will study all relevant documents, talk to witnesses and victims, and analyze electronic data – if necessary.

Once the facts of the matter have been established, the results will be summarized in a report and sent to the internal departments that require this information.

The possible results of the investigation include recommendations for disciplinary action (such as dismissal, official warning, transfer) or other remedial measures, such as in risk management or other internal processes.

If we are able and legally permitted to do so, we will inform you of the measures taken within three months – even if the investigation has not been completed by then.

10. Are there requirements for clarifying the facts?

Yes. Every investigator is required to adhere to certain rules of conduct, such as:

- The whistleblower must be protected! Neither his/her name nor any details from the report as allowed to be disclosed without justification.
- Every investigation must be fair, objective, without prejudice and conducted with respect.
 - The persons affected by the complaint or report have the right to be heard.
- Data and information must be treated confidentially.
- As soon as an investigator realizes that it is difficult for him/her to conduct the investigation objectively for personal reasons, he/she must report this conflict of interest. The investigating department will then transfer the case to another investigator.

11. Am I protected as a whistleblower?

Yes. SEW-EURODRIVE does not tolerate any retaliatory measures of any kind!

Anyone who submits a complaint or report in good faith will not be penalized for having done so. If you believe that retaliatory measures have been committed against you or anyone else, or that you or they have been discriminated against in any way for submitting a complaint, please notify SEW-EURODRIVE immediately through one of the company's reporting channels (preferably the whistleblower hotline).

We investigate all plausible allegations of discrimination. Substantiated allegations of discrimination by SEW-EURODRIVE will even be punished as a compliance violation.



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