

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

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***Note:**

When referring to persons or groups of persons in this document, the following refers to persons of all genders for linguistic simplification and better readability. The term "employees" also includes managers at all levels and members of executive bodies.

1. Preamble

Glen Dimplex Deutschland GmbH (hereinafter referred to as GDD), with its brands Dimplex and Riedel Kooling, takes its social responsibility very seriously as part of its business activities. GDD attaches great importance to acting with integrity and in compliance with human rights and environmental protection in its own business operations and along its supply chains.

Section 8 of the German Supply Chain Due Diligence Act (LkSG) stipulates that companies must have an appropriate and effective complaints procedure in place. The complaints procedure enables individuals to point out human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of GDD's business activities in its own business area or those of a direct supplier.

GDD has implemented such a complaints procedure, in order to identify and rectify grievances in the supply chains at an early stage and, if necessary, to launch preventive measures. The fulfillment of human rights and environmental due diligence obligations is a high priority for GDD.

The following rules of procedure provide information on the main features and functioning of the GDD's complaints procedure, the complaint channels, how to contact them and who is responsible. It also explains how incoming reports/complaints are processed and how to proceed in order to find a solution to reported grievances.

These rules of procedure are intended to explain how the complaints procedure works in an understandable, transparent and comprehensible manner.

2. Which violations can be reported?

All indications of possible human rights or environmental risks or violations of human rights or environmental obligations can be reported, if they have arisen through the economic activities of the GDD in its own business area or in its supply chain.

Examples of human rights or environmental risks and violations include:

- Export of hazardous waste
- Use of mercury and mercury compounds in manufacturing processes (in accordance with the Minamata Convention)
- Child labor
- Employment of persons in forced labor
- Slavery, slavery-like practices, servitude or other forms of domination or oppression in the workplace environment
- Disregard of the freedom of association
- Unequal treatment in employment
- Withholding an appropriate wage
- Working conditions that endanger the health of employees

3. Parties entitled to appeal and their right to protection

3.1 Who can report?

Any person or organization who is directly affected or who represents the interests of a directly affected person or group, or who is aware of a risk or violation (hereinafter referred to as the complainant), may submit a complaint via the GDD's complaints office. The complaint should meet the definition set out in section 2 and the complainant should be able to communicate accurate information about the complaint (see section 4)

3.2 Principle of confidentiality

The principle of confidentiality is observed at all times, so that the identity of the complainant is protected and treated confidentially at all times.

3.3 Protection against repressive actions

The GDD ensures that the complainant does not suffer any repressive actions as a result of the information provided. Business partners are also obliged to ensure this as part of the business relationship (e.g. through the Supplier Code of Conduct).

4. Content of a complaint

In order to be able to process a complaint effectively and quickly, the information should be formulated as detailed and comprehensive as possible. The following questions should be considered: Who? What? Where? How? and When? However, it is not a general requirement for the complainant to answer all of these W-questions. It is up to the complainant to decide how detailed they wish to describe the facts of the case. However, the more detailed the complainant presents the facts of the case, the more effectively and quickly GDD can deal with the grievance.

5. Reporting anonymously

GDD also processes reports received anonymously. In particular, the digital complaints system ("Safecall" - see section 6.1) makes it possible to submit anonymous and semi-anonymous reports (i.e. only Safecall knows the name of the complainant, GDD does not). Complainants can also (voluntarily) create an anonymous account via this system in order to subsequently contact and communicate with the responsible complaints officer(s).

6. Which channels are available for complaints?

GDD provides the following communication channels for reporting complaints:

6.1 „Safecall“: Digital complaints system and telephone reports

By commissioning "Safecall", the GDD has chosen a leading provider among whistleblowing service providers that has been supporting companies in setting up secure and confidential reporting systems for decades.

Digital reports can be submitted via an intuitive management software.

The "Safecall" **digital complaints system** can be accessed via the following link:
<https://www.safecall.co.uk/file-a-report/>

After selecting the relevant continent, the reporting form is available here in almost all languages. Complainants can choose whether they want to give their name, report anonymously or semi-anonymously (only Safecall knows the name of the complainant, GDD does not). Even with anonymous reports, communication between GDD and the complainant is possible via a protected system. Provided that the person making the report voluntarily sets up a password-protected account. The use of the "Safecall" system to submit a complaint is free of charge.

A report/complaint can also be submitted by telephone. For this purpose, the whistleblower must also contact "Safecall". "Safecall" can be reached by telephone around the clock, 365 days a year. The hotline is staffed by specialized investigators and provides all complainants with a secure communication channel through the use of certified interpreters for virtually every language in the world.

A list of **telephone numbers** that can be reached free of charge from over 130 countries is available here: <https://www.safecall.co.uk/file-a-report/telephone-numbers/>

In order to assign your message correctly, Safecall needs to know that the message concerns Glen Dimplex Germany, Riedel Kooling, or Dimplex Germany.

6.2 E-Mail and letter mail

The whistleblower can also send information/complaints directly to the GDD complaints office. These should be sent to:

Via E-Mail: **socialresponsibility@glendimplex.de**

Via letter mail to: **Glen Dimplex Deutschland GmbH
Social Responsibility Team
Am Goldenen Feld 18
95326 Kulmbach
Germany**

7. Procedure following receipt of a complaint and principles to be observed

Reports are reviewed and processed by GDD in accordance with legal requirements. GDD endeavors to investigate all reports and complaints in a fair, balanced and transparent manner and to resolve them as efficiently and effectively as possible.

The principle of confidentiality is observed at all times when processing reports/complaints. Confidential data may only be disclosed in the course of processing the report if this is necessary and legally permissible. The processing of the case is documented confidentially and access-protected.

The persons entrusted with processing the reports act impartially; in particular, they are independent and not bound by instructions and are obliged to maintain confidentiality.

All measures to clarify the facts must comply with the principle of proportionality, i.e. they must be suitable, necessary and appropriate in order to fulfill their purpose.

All complaints or reports are processed neutrally, objectively, appropriately and in accordance with the presumption of innocence.

7.1 Receipt acknowledgement of a complaint

If the complainant has provided contact details, they will receive confirmation of receipt within a few days of submitting their complaint. If the complainant has submitted a complaint anonymously and set up an anonymous account with "Safecall", they will also receive confirmation of receipt within a few days.

When using the digital complaints platform "Safecall", the complainant receives an activation link from the application. The complainant can use this link to set their password. The complainant can then log in to their account. If the complainant submits an anonymous report, they can also receive feedback from the responsible complaint handlers by creating such an account.

"Safecall" generates a user name with which the complainant can log in. After two working days, the complainant should log in to their account to see what feedback they have received on their complaint, and may also be asked questions by the relevant complaints handlers, which they should answer if possible.

7.2 Initial examination of the complaint

GDD takes all reports and information seriously. As a first step, the GDD Complaints Office examines whether the complaint falls within the material scope of the LkSG, whether the report is valid and whether there are factual indications that human rights and environmental risks or violations in accordance with Section 2 above may exist.

The complaints handlers will also check whether, if contact can be made with the complainant, further information is required from the complainant for processing purposes.

7.3 Comprehensive review of facts

After a successful initial check, the facts of the case are examined in detail by the complaints handler. If necessary, the GDD may also call in external parties to further process the report, while respecting data protection and the principle of confidentiality. The complainant will be involved

in the discussion and processing as far as possible. The GDD complaints office will take the necessary measures to clarify the facts of the case. If the report is rejected as unfounded after examination, the complaints office will inform the complainant immediately, stating the reasons for the rejection.

7.4 Elimination/prevention of grievances

If the complaint proves to be well-founded, a proposed solution is drawn up on the basis of the facts established. If the complainant is affected, this will be discussed with the complainant. GDD will endeavor to involve the complainant as far as possible in the processing of the complaint.

As an option, an amicable dispute resolution procedure may be offered, about which GDD will inform the complainant if such a procedure comes into consideration in the specific case.

If, in the course of clarifying the facts of the case, it is established that a violation of human rights and/or environmental obligations is imminent or is already taking place, remedial measures will be initiated immediately.

In the case of violations caused directly by GDD, GDD will actively endeavor to remedy the violation. GDD will also initiate measures to prevent the occurrence of such a breach in the future.

In the case of violations caused by direct or indirect suppliers or contractual partners of GDD, but for which GDD is not causally responsible or to which GDD has not contributed through its actions, GDD will actively support in remedying the violation.

7.5 Review of the remedy and conclusion of the procedure

The implementation of the proposed solution and remedial measures are reviewed and the outcome of the procedure is evaluated. Where possible and appropriate, this is done together with the complainant.

8. Handling of personal data

Personal data is processed in accordance with the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG), including the storage and deletion of data and the regulations on international data transfer.

9. Review of effectiveness – regularly or related to a specific event

The effectiveness of the complaints procedure is reviewed (at least) once a year and on an ad hoc basis. Among other things, it is evaluated whether the cases were processed as intended (if possible) in consultation with the complainant. It is also checked whether and to what extent the remedial measures were successful.