

# Work Instruction

## Complaints Procedure



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### Revision history

Version	Date of change	Content of/Reason for change	Author
1.0	19.12.2022	New release	Ethics, Risk & Compliance

Any changes in the text must be highlighted in gray

\* The English version of this instruction shall prevail. The translated version(s) merely constitutes a non-binding translation for convenience purposes only

## CONTENT

1	OBJECTIVE.....	3
2	REPORTING CHANNEL & CONTACT PERSON.....	3
3	REPORTING CATEGORIES .....	3
4	INCIDENT MANAGEMENT .....	3
5	FEEDBACK TO THE REPORTER.....	5
6	PROTECTION OF THE REPORTER .....	5
7	DATA PROTECTION.....	5

## 1 OBJECTIVE

Misconduct by internal and external individuals may cause permanent damage to LEONI as a company as well as its shareholders, employees and all other stakeholders (including employees within the supply chain of LEONI). LEONI is therefore obliged to prevent any form of improper or even criminal acts within its own sphere of influence. As part of the LEONI Compliance Management System, this includes the provision of reporting channels so that employees and external persons can simply and confidentially report cases of possible misconduct.

## 2 REPORTING CHANNEL & CONTACT PERSON

The **LEONI Integrity platform** (<https://leoni.integrityplatform.org/>) is a group-wide electronic reporting system which enables employees, customers and (employees of) business partners – also in anonymized form – the ability to report compliance risks, misconduct and suspicions of compliance violations and/or conduct liable to prosecution or contrary to regulations by supervisors and employees (“Report”). The Integrity Platform is operated under contract via EQS Integrity Line, a specially selected service provider, and is administered and secured outside of the LEONI IT infrastructure. The Integrity Platform can be accessed by potential reporter (internal and external person) who wants to report potential misconduct. The weblink can be accessed from any computer or mobile device with an internet connection and is available 24/7 in all relevant languages.

The external service provider EQS Integrity Line was selected carefully and is obligated by contract to observe the strict German and European data protection regulations. EQS Integrity Line performs regular IT security audits and penetration tests of the Integrity Platform.

Reports can also send **by Letter** to the Corporate Ethics, Risk & Compliance Department: Chief Compliance Officer, Marienstraße 7, 90402 Nuremberg, Germany or **by Email** to the Corporate Ethics, Risk & Compliance Department: [compliance@leoni.com](mailto:compliance@leoni.com)

## 3 REPORTING CATEGORIES

Bribery, Corruption and illegal payments	Data protection
Competition and Antitrust law	Information security
Fraud and embezzlement	Sexual harassment
Money laundering	Discrimination
Conflict of interest	Working conditions
Trade Compliance and Export Control	Environmental protection
Tax law	Violation of Code of Conduct (CoC) for Business Partner
Other economic crimes	

## 4 INCIDENT MANAGEMENT

The incident management at LEONI follows a clearly defined and documented process as part of the LEONI Compliance Management System.

After a report is submitted, the report will be taken by an appointed qualified and independent position within the department Corporate Ethics, Risk & Compliance Department (Case Manager). The Case Manager will determine the necessary steps of how to proceed and, if needed, will

contact the reporter to clarify further questions or obtain additional information via the reporting channel the reporter used.

Only a limited number of employees, who are appointed by name, have access for each report category. In the process it is differentiated by operational competence. During the processing of a report, however, it may be required in individual cases to grant access to further persons or institutions who are involved in the investigation. In addition, a translation office may obtain access to the contents defined and approved by LEONI if necessary.

### **Plausibility Check**

When information is submitted via one of the above-mentioned reporting channels, it is checked by the Case Manager to determine whether the reported incident could actually have taken place in the way it was reported and, if so, whether it is a violation of internal or external regulations (incl. LEONI Code of Conduct). Within the framework of this first initial and summary check, which considers the information sent and some preliminary research, the Case Manager assesses whether the information is plausible. An investigation will be initiated for plausible cases.

### **Investigation**

The aim of an investigation is to clarify concrete allegations with the means legally available for companies, to prove any misconduct of employees or third parties, to impose appropriate sanctions, to retrieve assets and, if possible, to prevent further future misconduct in the long term by implementing measures, or to minimize the risks of such misconduct as much as possible. Investigations can also result in uncorroborated misconduct or proven not to exist.

Each investigation is carried out professionally, impartially, objectively, carefully, confidentially and promptly, and documented accordingly. All facts that can be gathered through the analysis of data, documents and information from interviews are included in the investigation. An investigation will be carried out in accordance with all applicable laws and regulatory requirements (this applies to both local and international regulations). Particular importance is attached to the principle of proportionality in the choice of resources and in the way the investigation is conducted. The confidentiality of all information will be upheld, especially the protection of personal data.

### **Measures and consequences**

Breaches of law and non-compliance with internal guidelines and (inter)national laws / regulations will be strictly prosecuted and punished accordingly. As a rule, the persons and areas affected by an investigation or compliance violation, as well as other areas in which the same or similar facts could occur, will receive a specific compliance training based on the misconduct discovered. This is intended to further improve compliance awareness and knowledge of internal guidelines and legislation in such risk-prone areas.

### **Continuous process of improvement**

Even during an investigation (i.e. within the scope of ad hoc measures), but in any event following the conclusion of an investigation, an analysis is made of which process or control weaknesses enabled or favored the violation. In cooperation with the responsible departments and business partners, appropriate measures for improvements are defined and their implementation monitored. The aim is to further reduce the risk of a renewed occurrence of such violations in concrete ways.

## **5 FEEDBACK TO THE REPORTER**

The reporter will receive a confirmation regarding his/her report within 3-4 working days – if technically possible – that the information has been received and can be sure that it is being processed by the Case Manager. In case the information is plausible there will be further steps required as explained in the previous section.

The reporter will receive regular updates regarding his/her report at the latest after completion of an investigation. It is to be kept in mind that an investigation can take several months, especially in complex cases.

## **6 PROTECTION OF THE REPORTER**

The reporter has the choice to publish contact details or prefer to report anonymously. In case the reporter shares the contact details they will be kept strictly confidential. LEONI ensures an effective protection against discrimination or punishment on the basis of complaints/reports.

## **7 DATA PROTECTION**

Personal data will be processed only with the consent of the reporter and exclusively for the purpose of processing the report.

The reporter decides during the course of making a report which data he/she wants to provide. The contact details, the category and the description of the incident as well as related documents or further information submitted are collected and stored voluntarily. Data is stored for the duration of the processing of a report (based on LEONI Data Protection process).