

Rules of Procedure Information on BWI Complaints Procedure in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains

Bildquelle: Adobe Stock/greenbutterfly

If you have knowledge on potential risks or violations of human rights or environmental principles within the business activities of BWI or in its supply chain, we encourage you to use the BWI complaints procedure. The purpose of this document is to provide you with important information on BWI's complaints procedure, such as available reporting channels including detailed contact information and an overview on how your complaint will be internally processed and investigated.

1. Who may report?

Every BWI-internal and -external person or stakeholder who has knowledge of potential risks or violations of human rights or environmental regulations in BWI's own business activities or in its supply chain may report their concerns.

2. What kind of risks or violations can I report?

Your complaint can relate to any human right or environmental regulation listed in the Supply Chain Act (Lieferkettensorgfaltspflichtengesetz), for example:

Human rights risks/violations:

- Disregard of occupational health and safety (according to national regulations);
- Child labor below minimum permissible age/forced labor/slavery;
- Disregard for freedom of association;
- Discrimination (ancestry, disability, age, gender, religion);
- Withholding of adequate wages (under national regulations).

Environmental risks/violations:

- Ban on treatment of mercury waste,
- Ban on production & use of persistent organic pollutants.
- Prohibition of non-environmentally sound handling, collection, storage and disposal of waste.
- Prohibition of import and export of hazardous wastes

3. How and where can I report?

You can report either in person or anonymously to the members of the Compliance Management:

By phone

+49 (22 25) 98 81 44 44 (female contact person) /

+49 (22 25) 98 81 85 00 (male contact person)

By e-mail

External mailbox: bwi.fp.Compliance.extern@bwi.de

By letter

BWI GmbH, Compliance Management, Karl-Legien-Strasse 188/192, 53117 Bonn, Germany

Bildquelle: BWI/Löschke

Via our whistleblowingsystem

[Link](#)

(Please note that you can add attachments to your report. You can upload up to 5 files in '.png', '.jpg' or '.pdf' format. The maximum file size is 5 MB.)

Via our ombudsperson (in Germany)

Law firm FS-PP Berlin, attorney Dr. Rainer Frank

Phone: +49 (30) 31 86 85 69

E-mail: ombudsperson-bwi@fs-pp.de / Webseite: [FS-PP Berlin](#)

4. Who will receive and process my complaint?

Regardless of the reporting channel you choose, all complaints will be forwarded to our Compliance Management team. The Compliance Management team processes and investigates your complaint in accordance with our internal guidelines and legal requirements, especially taking into account your protection as a whistleblower. Members of the Compliance Management team are bound to confidentiality and investigate complaints independently and autonomously to the largest extent possible. If deemed necessary, other internal or external parties will be involved in the investigation.

5. Will I suffer any disadvantages or harm due to my complaint?

If you have reported a violation to the best of your knowledge and in good faith, you have the right to be protected from any kind of harm or disadvantage as a result of your complaint. If you have any indication that you may be subject to reprisals or retaliation, please report this to the Compliance Management team so that we can react accordingly. The BWI GmbH does not tolerate any violations regarding the protection of whistleblowers.

However, if you knowingly provide false or misleading information, you may face consequences.

6. How is my complaint processed and when will I receive an answer?

The complaints process consists of the following 5 steps:

Step 1: Confirmation of receipt

Within 7 days, you will receive a confirmation that the Compliance Management team has obtained your report. In addition to that, you will receive the contact details of the assigned member of the Compliance Management team for communication purposes throughout the complaint process.

Step 2: Plausibility check

As a preliminary check, the Compliance Management Team assesses, whether your complaint is within the scope of the Complaint Management process and whether the information received is plausible. If this is the case, the Compliance Management team decides whether your complaint is investigated and if other internal or external experts have to be involved in the investigation. In the event that your case is closed without further investigation, you will be informed about the reasons.

Bildquelle: BWI/Löschke

Step 3: Clarification of facts

The Compliance Management team clarifies and examines the facts and circumstances of your complaint. If deemed necessary other internal or external parties may be involved.

Step 4 & 5: Remedial action & information on completion of the investigation

Based on the established facts, a proposal for remedial action will developed. Where appropriate you will be involved in this process. Subsequently remedial measures will be taken and followed up. After 3 months at the latest, you will be informed about the results of the investigation and measures taken. In case the investigation is not completed after 3 months, you will be notified about the interim status of the investigation.