

RULES OF PROCEDURE FOR THE COMPLAINTS PROCEDURE IN ACCORDANCE WITH SECTION 8 OF THE GERMAN SUPPLY CHAIN DUE DILIGENCE ACT (LKSG)

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1. PURPOSE

The Block Group attaches great importance to safeguarding human rights and protecting the environment. These values are a permanent fixture in our corporate culture. The Block Group has, therefore, put in place a complaints procedure for both our internal business activities and our value chain. This facilitates the recognition, clarification and rectification of human rights violations and environmental offences at an early stage. As a result, we aim to minimise and avoid potential violations of protected human rights and environmental obligations.

This procedure describes the fundamental aspects of the complaints procedure, in particular access, accessibility and responsibilities. Furthermore, it provides information about the process in which incoming reports and complaints, in particular the complaints management procedure, are handled.

2. AREA OF APPLICATION

The Block Group's complaints procedure is for all individuals or groups who may be affected by human rights violations or environmental offences within our own business area or along our supply chain. This is geared towards all our employees, business partners and their employees, partners and customers.

Examples of human rights-related risks and obligations include

- Forced labour
- Child labour
- Discrimination in the workplace
- Abuse or harassment in the workplace
- Withholding adequate labour contracts, wages or working hours
- Freedom of association and the right to collective bargaining
- Safety in the workplace
- Use of security guards

Examples of environmental risks and obligations include

- Withholding appropriate environmental and climate protection
- Damage to biodiversity and animal welfare
- Unlawful handling of waste, chemicals and hazardous substances

Examples of business integrity risks

- Corruption, trade controls and money laundering
- Data protection
- Communication and control

3. COMPLAINTS CHANNEL

Our complaints channel can be reached by e-mail at the following address: hinweisgeber@block-gruppe.de

4. COMPLAINTS PROCEDURE PROCESS

Confirmation of receipt of a report:

the person filing a report will receive e-mail confirmation of receipt of the report within seven working days. However, feedback can only be provided if a communication channel exists with the whistleblower.

Reviewing the report:

All comments are reviewed for validity. As soon as the review reveals a violation of human rights

and environmental obligations are deemed unfounded or it is determined that a violation has not occurred, the report is not followed up. The person filing the report will be informed of this.

Investigations:

Guarantees are in place so that contact with the reporting person is maintained at all times. Within three months of confirmation of receipt, information shall be made available to the reporting persons about planned measures and those already adopted. Feedback shall only be given if internal investigations or audits are not restricted and the rights of the persons named in the report are not affected.

Use of remedial measures:

Appropriate preventive and remedial measures are adopted if human rights or environmental risks, violations or breaches are identified during investigations. Attempts shall be made to resolve matters if all parties involved so wish.

Qualification

Appropriate measures shall be adopted insofar as the internal investigation identifies indications of misconduct or a punishable offence to be punished. The whistleblower shall be informed of the conclusion of the investigation.

Documentation:

The respective complaints process is documented and retained in line with legal requirements.

Review of the effectiveness of the complaints procedure:

Complaints procedures are reviewed annually and on an ad hoc basis. Consideration is also given to the respective valid version of the BAFA handout on the complaints procedure.

5. DATA PROTECTION

Employees responsible for handling complaints shall, at all times, maintain confidentiality in dealings with third parties in relation to the received information. This principle applies, in particular, to information that entails personal data.

If desired and legally permissible, the identity of persons furnishing information or submitting complaints shall be treated confidentially and not disclosed. However, please note that legal and regulatory requirements for disclosure and reporting are not subject to the principle of confidentiality.

6. VALIDITY

These rules of procedure are valid from 01.01.2024.

7. CONTACT DETAILS

If you have any questions about our whistleblower system or complaints procedure or this document, please contact us by post at

Eugen Block Holding GmbH

Lademannbogen 127, D-22339 Hamburg

or by e-mail at hinweisgeber@block-gruppe.de