

RULES OF PROCEDURE FOR THE COMPLAINTS PROCEDURE ACCORDING TO THE ACT ON CORPORATE DUE DILIGENCE OBLIGA- TIONS IN SUPPLY CHAINS (SCDDA)

AMPRION

22. DEZEMBER 2023

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Rules of procedure for the complaints procedure according to the SCDDA

1. Aim of the complaints procedure

Amprion would like to give its employees, but also any third party, the possibility to contact an internal body or an external ombudsman, if they want to report (also anonymously) risks, or already occurred violations of human rights or environment-related obligations in the supply chain of Amprion GmbH, as well as the subsidiary Amprion Offshore GmbH in its own business area (together Amprion). One can also report human rights or environment-related violations as well as risks at a direct or indirect supplier of Amprion.

Amprion is committed to identify human rights and environment-related risks as well as violations that have already occurred in the supply chain, and to remedy them immediately and sustainably.

2. Scope

Reportable information within the meaning of this complaints procedure is any information about risks or violations related to human rights or environment-related obligations along the entire supply chain of Amprion. The supply chain includes all entities of Amprion as well as Amprion's direct and indirect suppliers.

Human rights include the prohibition of child labor, forced labor and slavery, the provision of occupational health and safety, freedom of association, non-discrimination, minimum wage, prohibition of pollution and the requirement to preserve natural resources such as soil, water, air.¹

Environment-related obligations arise in connection with mercury, chemicals (in particular persistent organic substances, so-called POPs) and hazardous waste.²

Included are not only risks and violations within Amprion GmbH, as well as Amprion Offshore GmbH, but also within the companies / sites / production facilities / branches of all direct and indirect suppliers of Amprion.

3. Persons entitled to report and complaints channels

In principle, EVERYONE who has perceived a risk or a violation of human rights or environment-related obligations is entitled to report. A personal concern (meaning that one is affected by the effects of the violation of the risk) is not required. Employees of Amprion as well as any person (including external) who has become aware of risks or violations related to human rights or environment-related obligations along the supply chain of Amprion are entitled to report. Employees of Amprion's direct or indirect suppliers may also submit reports.

¹ For a detailed, more in-depth presentation, please refer to the law, the explanatory memorandum and the guidance provided by the Federal Office for Economic Affairs and Export Control (BAFA).

² At the same place.

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Information can be submitted to the following offices:

To the Compliance Officer at Amprion, Dr. Christoph Richter. He can be contacted as following:

By e-mail to: Christoph.Richter@amprion.net

By phone: +49 231 5849 13100

By post to: Dr. Christoph Richter
PERSONAL / CONFIDENTIAL Amprion GmbH
Leiter Risikomanagement / Compliance / Datenschutz
Robert-Schumann-Straße 7
44263 Dortmund

By fax to: +49 231 5849 14661 marked with PERSONAL / CONFIDENTIAL

We recommend sending documents by fax only after prior announcement.

To the external ombudsman of Amprion, lawyer Dr. Thomas Höch. He can be contacted as following:

By e-mail to: hoech@hoech-partner.de

By phone: +49 231 2222 7676

By post to: Rechtsanwalt Dr. Thomas Höch
PERSONAL / CONFIDENTIAL
Wittekindstraße 30
44139 Dortmund

By fax to: +49 231 2222 7677 marked with PERSONAL / CONFIDENTIAL

We recommend sending documents by fax only after prior announcement.

The Compliance Officer and the current ombudsman can be contacted by phone during regular working hours on weekdays. In addition, they can also be contacted at any time by e-mail and post. Postal items should always be marked with a note such as PERSONAL / CONFIDENTIAL, TO BE OPENED ONLY BY RECIPIENT or similar.

4. Process of the complaints procedure

4.1 Content process of the complaints procedure



1. Involvement of the Compliance Officer or the ombudsman

The Compliance Officer is responsible for examining the report / complaint. If a report / complaint is reported to the ombudsman, the ombudsman will forward the report / complaint – anonymously, if the reported person requests it – to the Compliance Officer.

IMPORTANT: Please provide the Compliance Officer / ombudsman with your contact details together with the information, otherwise we will not be able to inform you about the further course of the procedure. If you have requested anonymity when submitting your information, this data will not be passed on by the Compliance Officer / ombudsman.

2. Examination of the complaint / report

The Compliance Officer analyzes and evaluates incoming internal and external information to sufficiently specify possible misconduct. If the possibility of misconduct exists assuming the information is true, the facts are clarified as far as possible by the Compliance Officer. If the extent of the examination of the facts requires it, the departments and, if necessary, the Internal Audit department or external experts (e.g. lawyers or auditors) will support the examination at request of the Compliance Officer.

3. Discussion of the facts

The facts of the case are discussed with the person having reported the information (if requested, the person having reported the information remains anonymous). If the case is closed (i.e. the complaint is rejected), the person receives a statement of reasons. If the case is not closed, a solution will be developed.

4. Development of a solution

A proposal for a solution will be developed on the basis of the facts determined. If the person having reported the information is affected, this proposal is discussed with them. If the person having reported the information is not affected, they will be informed of the proposed solution. In the event of a violation of human rights, agreements on compensation can be made in individual cases. Relevant data protection regulations are observed throughout. This may also influence the amount of information provided to you in the course of the proceedings.

5. Implementation of appropriate remedial measures

For Amprion, taking appropriate remedial measures without undue delay is a top priority. The agreed or elaborated remedial measures, i.e. measures to end the violation as immediately as possible, are implemented. The implementation will be carried out either by a Amprion-internal intervention team that will be determined in the concrete individual case (formed and led by the Compliance Officer) or by an organization commissioned by Amprion, which will also be in regular exchange with Amprion's Compliance Officer.

6. Review of the remedy and conclusion of the procedure

The implementation of the remedial measures is reviewed and evaluated after they have been carried out. In the case of extensive remedial measures, a further annual review is conducted. An interim report is prepared on the results of the evaluation. If the person having reported the information was also the person affected, the results of the evaluation are discussed with them. In all other cases, they receive a final message. If the risk or violation is sufficiently eliminated, the interim report becomes the final report, and the procedure is closed.

4.2 Temporal process of the complaints procedure

After the information has been reported, a confirmation of receipt is sent to the person having reported the information, as long as the person having reported the information has left their contact details. The Compliance Officer and any specialist departments that may be involved endeavor to review reports promptly, eliminate risks and effectively remedy any violations that may have occurred. Depending on the complexity of the facts to be examined, a respective investigation may take from a few days to several weeks or even months of intensive processing or clarification time. Amprion considers the relevant statutory time limits when providing feedback to the person having reported the information.

5. Contact persons

The Compliance Officer (see above for his contact details) is responsible for examining information. If the extent of the examination of the facts requires it, the departments concerned and, if necessary, the Internal Audit department will support the examination activities at the request of the Compliance Officer. Depending on the content of the complaint and the facts of the case, the departments concerned may include in particular the Legal/Board Affairs/Risk & Compliance, Human Resources Management, Corporate Strategy/Public Affairs/Corporate Development, European Affairs and Sustainability Management, Occupational Safety and Procurement departments.

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6. Handling of complaints and confidentiality

The Compliance Officer will handle every report in strict confidentiality and investigate it as required by the individual facts or complaint in question. Case processing will be objective and impartial. The Compliance Officer acts independently. The external ombudsman is an external person of trust appointed by Amprion. He is bound to secrecy. He receives reports of violations in relation to Amprion and forwards them to the Compliance Officer, anonymously if the reported person requested it.

7. Protection of persons having reported information

Reports on critical facts in the meaning of the SCDDA are explicitly appreciated by Amprion. They must not be misunderstood as disloyal behavior. Amprion is interested in uncovering improper behavior or risks and in investigating possible indications of such behavior. No person reporting information has to fear disadvantages because of a report in the context of this complaints procedure. Amprion will not tolerate any reprisals against a person reporting information.

8. Effectiveness of the complaints procedure

The effectiveness of the complaints procedure must be reviewed at least once a year and on an ad hoc basis.

Amprion has already committed itself to the recognition, support and observance of core values in the area of human rights and environmental protection before the introduction of the SCDDA. Amprion ensures that created standards are observed within our company. Amprion expects the same from its suppliers.

Constructive hints are chances for Amprion to become better together.