

Rules of procedure for the complaint mechanism

This document states the procedural rules of the Spherea GmbH for dealing with complaints. The rules of procedure describe the complaint procedure established by the Spherea GmbH.

The complaints procedure enables persons who are directly affected by economic activities in the business area of the Spherea GmbH or persons who have knowledge thereof to point out human rights and environmental risks or violations (hereafter "whistleblower"). This also includes risks or violations arising from the actions of direct and indirect suppliers of the Spherea GmbH. In addition, indications of violations of laws, which are subject to penalties or fines (e.g. corruption, money laundering, ...), as well as violations of regulations or internal company rules and self-imposed standards can be reported.

1. Reporting channels

You can access the complaint mechanism through the following channels:

By E-Mail: compliance@spherea.de

By phone: +49 731 17630-0

By post: Spherea GmbH, Beschwerdestelle, Magirus-Deutz-Straße 13, 89077 Ulm

Anonymous online submission: <https://spherea.de/en/complaint-mechanism/>

All access channels can be selected in English or German. All inputs are recorded by our staff for further processing in accordance with legal requirements and respecting the protection of the whistleblower.

2. Receipt confirmation

Every whistleblower will receive an acknowledgement of receipt within seven days and a contact person (hereafter "Complaint Officer") for the further course of the procedure. We endeavor to communicate during the procedure in a language that ensures the best possible understanding.

If no contact details are provided by the whistleblower, no feedback on the status of the procedure can be provided!

3. Fact check

The responsible complaint officer shall verify whether the complaint falls within the scope of the complaint procedure.

a) Rejection of the complaint

If the complaint does not fall within the scope of the complaint procedure, the whistleblower will receive a corresponding response within two weeks of receipt of the complaint. Reasons for the rejection will be given to the whistleblower.

b) Follow up of the complaint

If the complaint falls within the scope of the complaint procedure, the complaint officer will clarify the facts. If contact details have been provided, the complaint officer will discuss the facts with the whistleblower to develop a better understanding of the case.

If the investigation shows that the information provided by the whistleblower is not sufficient or not relevant for further clarification of the complaint, the complaint officer shall inform the whistleblower of this and request further information.

4. Initiation of measures

If the examination of the complaint reveals that the violation of human rights or environmental obligations appears possible, is imminent or has occurred, the Spherea GmbH will initiate appropriate preventive and / or remedial measures. The aim of these measures is to prevent a violation of protected legal positions or to minimize or eliminate violations that have already occurred. An analogous procedure is followed in the case of violations of laws, regulations, internal company rules and standards that are identified during the procedure. A statement to the whistleblower on the result of the review and the measures taken is issued within three months.

5. Effectiveness check

The effectiveness of the complaint procedure is reviewed once a year.

6. Documentation

The respective complaint process is documented and kept for a period of three years. Voluntary feedback from the whistleblower on the overall process after completion of the procedure helps the Spherea GmbH in the further development and annual effectiveness check of the complaint procedure and is therefore expressly desired.

7. Privacy and confidentiality

Spherea GmbH ensures through appropriate personnel, organizational and technical measures that the confidentiality of the identity of the whistleblower is maintained and effective protection against disadvantage or punishment due to a complaint is guaranteed. The persons entrusted with the processing of complaints and the discussion of the facts are experts and obliged to act impartially. They perform their duties independently and are not bounded by instructions. They are bound to secrecy.

8. Cost

The procedure is free of charge for the whistleblowers.