



Grievance Procedure Policy
of GESCO SE
in accordance with Section 8 of the German Act on Corporate Due
Diligence in Supply Chains (CDDSC)

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A. Introduction

I. Purpose of the grievance procedure

The protection of human rights and the environment is one of the fundamental prerequisites for GESCO Group companies' business activities.

For this reason, the GESCO Group has set up a grievance system through which those affected, but also other persons, can report possible violations of human rights and certain environmental goods, provided that these (possible) violations have been committed by GESCO Group companies or its suppliers.

The grievance system was set up in accordance with the German Act on Corporate Due Diligence in Supply Chains¹, which will apply to the GESCO Group effective January 1, 2024, and will supplement the whistleblower system already in place in the Group in accordance with the Whistleblower Protection Act².

The aim of the grievance system is to give GESCO Group companies the opportunity to initiate measures against imminent human rights and environmental violations before people or certain environmental goods have actually been harmed (**early warning system**). If a violation of human rights or the relevant environmental goods has already occurred, the grievance system helps prevent further violations of the same kind as far as possible or minimize the consequences of damage (**remedial measures**).

II. Purpose of these rules of procedure

These rules of procedure describe

- The individuals who are entitled to lodge a grievance,
- The instances in which a grievance may be submitted,
- The place where the grievance may be submitted,
- The manner in which the grievance may be submitted,
- The manner in which the complainant is protected against possible retribution and
- The procedures that GESCO Group companies will use to address a grievance.

The rules of procedure are designed to implement the requirements of Section 8 of the Supply Chain Due Diligence Act.

B. Who may file a grievance?

I. Any individual

In principle, everyone has the right to lodge a grievance ("**everyone's right**").

For example, anyone who believes that his or her human rights have been or could be violated by a GESCO Group company (own business unit) or its suppliers (supply chain) may submit a grievance. This

¹ Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (supply chain due diligence act) of July 16, 2021 (BGBl. I P. 2959).

² Act for Better Protection of Whistleblowers (Whistleblower Protection Act) of May 31, 2023 (BGBl. 2023 I No. 140).

rule also applies to all persons who believe that GESCO Group companies (own business unit) or their suppliers (supply chain) have committed or may commit certain environmental violations (**directly affected individuals**). The following individuals are entitled to lodge a grievance:

- **Employees** of GESCO Group companies,
- **Employees of direct or indirect suppliers** of GESCO Group companies,
- **Residents** who live at the local sites of GESCO Group companies or at the local sites of the suppliers of GESCO Group companies.

Individuals who are incapable of entering into legal transactions are also entitled to lodge a grievance. This rule applies to **minors** affected by child and forced labor. If these individuals lodge a grievance, the GESCO Group companies will ensure that the minors are provided with a legal adviser if the subject matter of the grievance so requires.

In addition, persons who are not directly affected by risks or violations (**indirectly affected individuals**) may also submit a grievance. The grievance may also be made on behalf of directly affected individuals.

II. Legal entities, associations of persons

Legal entities and associations of persons, e.g., partnerships, also have the right to lodge a grievance. They may be directly affected individuals or represent directly affected individuals in a grievance. Complainants in this regard include:

- **Trade unions** that file a grievance on behalf of their members regarding the violation of freedom of association at a direct supplier of a GESCO Group company,
- **Media representatives** who, for example, draw attention to environmental risks at an international location of a GESCO Group company,
- **Civil society organizations** that submit a grievance about a violation of the ban on forced labor at an indirect supplier of a GESCO Group company.

A tip may also be **submitted jointly**. This applies in particular in cases where a **large number of individuals** are **affected** by the same risk or comparable injuries, for example in the case of

- Violations of pay equity,
- Occupational safety requirements,
- Systematic discrimination,
- Sexual harassment,
- Illegal land seizures,
- Environmental pollution.

C. In which cases may a grievance be submitted?

I. (Possible) violation of human rights or certain environmental assets

Grievances may involve human rights or environmental risks as well as violations of human rights or environmental requirements in accordance with Section 2, Paragraph 2 of the Supply Chain Due Diligence Act and Paragraph 3 of the same act, insofar as these are the result of commercial activity by GESCO Group companies.

II. What are human rights violations and human rights risks?

A human rights risk or a human rights violation exists if a GESCO Group company or a supplier of a GESCO Group company has violated the following prohibitions or there is a sufficient probability of a violation of the following prohibitions due to actual circumstances:

1. **Child labor** (as a rule, the employment of children under the age of 15 is prohibited),
2. **Forced labor**,
3. **Slavery, sexual exploitation**,
4. **Failure to comply with health and safety regulations** under the law that applies in the place of employment,
5. **Withholding an appropriate wage**,
6. Use of private or public **security forces** if they are inadequately controlled, thereby violating the prohibition of torture or degrading treatment, among other things,
7. **Contamination** of soil, water, air and excessive water consumption,
8. **Unlawful eviction or dispossession of land, forests or waters**,
9. **Any action or omission** that is likely to impair a protected legal position in a particularly serious manner and whose unlawfulness is obvious (general clause).

III. What are considered to be violations of certain environmental goods and environmental risks?

An environmental risk or an environmental violation exists if a GESCO Group company or a supplier of a GESCO Group company has violated the following prohibitions or there is a sufficient probability of a violation of the following prohibitions due to actual circumstances:

1. Ban on the use of **mercury** in manufacturing processes,
2. Prohibition of improper treatment of **mercury waste**,
3. Ban on the production and use of **certain chemicals** and **persistent organic pollutants**,
4. Prohibition of **non-environmentally sound handling**, collection, storage and disposal of **waste**,
5. Various bans on the **export and import** of certain **hazardous waste**.

IV. Who has to commit the (possible) violation of human rights or the environment?

The violation of human rights or environmental goods or the causation of a human rights or environmental risk must have been caused by a GESCO Group company or by a supplier of a GESCO Group company. This is the case if

- a **GESCO Group company** itself violates or threatens to violate the protection of human rights or certain environmental goods. GESCO Group companies include:
 1. **AstroPlast** (<https://www.astroplast.de>):
AstroPlast Kunststofftechnik GmbH & Co. KG, Meschede, Germany

AstroPlast Verwaltungs GmbH, Meschede, Germany

- 2. Dörrenberg / Saglam/ Tremblay/ Middle Kingdom** (<https://www.doerrenberg.de>):
Dörrenberg Edelstahl GmbH, Engelskirchen, Germany
Dörrenberg Tratamientos Termicos S.L. Alasua, Navarre, Spain
Saglam-Metal Sanyi ve Ticaret A.S., Şekerpınarı-Çayırova, Kocaeli, Turkey
Doerrenberg Special Steel Corp., Macedonia, Ohio, USA
Tremblay Tool Steels LLC, Macedonia, Ohio, USA
Doerrenberg Real Estate LLC, Cleveland, Ohio, USA
Doerrenberg Special Steels PTE. Ltd., German Center, Singapore
Doerrenberg International PTE. Ltd., German Center, Singapore
Doerrenberg Special Steels Taiwan Ltd., Taiwan City, Taiwan
Doerrenberg Special Steels Korea Co. Ltd., Jeongwang-dong, South Korea
Middle Kingdom Special Steels PTE. Ltd., German Center, Singapore
Jiashan Doerrenberg Mould & Die Trading Co., Jiashan, China
- 3. Funke** (<https://www.franzfunke.de>):
Franz Funke Zerspanungstechnik GmbH & Co. KG, Sundern, Germany
Franz Funke Verwaltungs GmbH, Sundern, Germany
- 4. INEX / Sommer & Strassburger/ Hubl** (<https://www.inex-solutions.de>):
INEX - solutions GmbH, Bretten, Germany
Sommer & Straßburger Edelstahlanlagenbau GmbH, Bretten, Germany
So-Stra Verwaltungs GmbH, Bretten, Germany
Hubl GmbH, Vaihingen/Enz, Germany
- 5. Kesel** (<https://www.kesel.com>):
Georg Kesel GmbH & Co KG, Kempten, Germany
Kesel & Probst Verwaltungsgesellschaft mbH, Kempten, Germany
Kesel International GmbH, Kempten, Germany
Kesel Machinery (Jiashan) Co. Ltd., Jiashan County, Jiaying City, China
Kesel North America, LLC, Janesville, Wyoming, USA
- 6. MAE** (<https://mae-group.com>):
MAE Maschinen- und Apparatebau Götzen GmbH, Erkrath, Germany
MAE Amerika GmbH, Erkrath, Germany
MAE-Eitel, Inc. Orwigsburg, Pennsylvania, USA
MAE Machine (Beijing) Co. Ltd, Beijing, China
- 7. Pickardt & Gerlach (PGW)/ Hekhorn** (<https://www.pgwpgw.de>):
Pickhardt & Gerlach GmbH & Co KG, Finnentrop, Germany
Hekhorn Verwaltungs-GmbH, Finnentrop, Germany
Hekhorn Immobilien GmbH, Finnentrop, Germany
- 8. Setter / Q-Plast/ SQG/ HRP** (<https://www.setter-germany.com>):
Setter Holding GmbH, Emmerich, Germany
Setter GmbH & Co. Papierverarbeitung, Emmerich, Germany
Q-Plast GmbH & Co. Plastics Processing, Emmerich, Germany
Q-Plast Beteiligungs-GmbH, Emmerich, Germany
Setterstix Inc. Fountain Inn, South Carolina, USA
SQG Verwaltungs-GmbH, Emmerich, Germany
SETTERSTIX de Mexico, S.A.de C.V., San Luis Potosi, Mexico

HRP-Leasing GmbH, Emmerich, Germany

9. SVT/ CONNEX/ BAV (<https://www.svt-gmbh.com>):

SVT GmbH, Schwelm, Germany

SVT APAC Pte. Ltd, Singapore

CONNEX SVT Inc., Katy, Houston, Texas, USA

BAV- Tabbanya Kft, Tababanya, Hungary

10. United MedTec/ Amtrion/ Tragfreund/ Haseke (<https://www.amtrion.de>):

United MedTec Holding GmbH, Porta Westfalica, Germany

AMTRION GmbH, Porta Westfalica, Germany

Tragfreund GmbH, Porta Westfalica, Germany

Haseke Beteiligungs-GmbH, Porta Westfalica, Germany

AMTRION USA Inc., Fountain Inn, South Carolina, USA

- A **direct supplier** (e.g., a supplier of steel, chemicals, sheet metal, plastics) of a GESCO Group company violates or threatens to violate the protection of human rights or certain environmental goods,
- An **indirect supplier** of a GESCO Group company violates or threatens to violate the protection of human rights or certain environmental goods. Indirect suppliers are those suppliers who do not supply the GESCO Group companies themselves, but whose products reach the GESCO Group companies via direct suppliers (e.g., a sheet metal delivered to a direct supplier of the GESCO Group who, in turn, delivers this sheet metal to a GESCO Group company).

IV. When may a grievance be rejected?

The [GESCO Group Grievance Office](#) may reject a grievance if there is obviously no violation of human rights or no violation of certain environmental goods or if such violations are not committed by a GESCO Group company or by a supplier of GESCO Group companies. In addition, a purely fictitious or abusive grievance may be rejected.

In these cases, the [GESCO Group Grievance Office](#) will refrain from pursuing the grievance any further. The complainant will be notified about the rejection and the reasons for it.

D. Where may a grievance be submitted?

I. Website

Complainants and whistleblowers initially have the opportunity to submit grievances and information **directly** via the [websites of the GESCO Group companies](#). Under the tab “**Human Rights and Environmental Risks,**” they will find an **input mask** where the grievance may be submitted.

II. Personal contact

Complainants and whistleblowers may also address their grievances to the **Internal Grievance Office of GESCO Group**. The contact persons for the internal grievance office are the external ombudsman of GESCO Group and a qualified representative of **GESCO SE**. You can reach them using the following contact information;

1. Internal Grievance Office I:

Compliance Officer Services Legal
Attorney Stephan Rheinwald
Telemannstrasse 22
53173 Bonn
Tel: +49 (0) 228/35036291
Mobile: +49 171 7722906 35036290
E-mail: s.rheinwald@cos-legal.eu

2. Internal Grievance Office II:

GESCO SE
In-house attorney Alex Stillie
Legal Counsel of GESCO SE
Johannisberg 7, 42103 Wuppertal
Mobile: +49 173 6049324 35036290
hinweise@GESCO.de

E. Are there any costs involved in filing the grievance?

The submission of grievances is free of charge. The only exception to this are the personal costs (telephone, Internet, etc.) incurred through technical contact with the GESCO Group grievance system.

F. How should the grievance be formulated?

The grievance can be written in simple language. It should contain information that is specific enough to clarify the facts in question.

G. In which languages can the grievance be submitted?

GESCO Group facilitates the use of a grievance system in **all languages** that are commonly spoken within the **supply chains** of GESCO Group companies. The complainants can find these languages on the [websites of the GESCO Group companies](#).

H. How does the grievance procedure specifically work?

The grievance procedure consists of the following steps:

I. Confirmation of the grievance's receipt and continuous contact with the whistleblower

The [GESCO Group Grievance Office](#) **will confirm** receipt of the grievance to the complainant and document the grievance procedure from the initial contact to the conclusion of the grievance procedure. In addition, the [GESCO Group Grievance Office](#) **will inform** the complainant about the usual procedure and the expected duration of the proceedings. It will also inform the complainant about his

or her rights to be protected against discrimination or retribution as a result of the filed grievance. In addition, it will inform the complainant that other formal grievance procedures may be used.

II. Review of the grievance

The [GESCO Group Grievance Office](#) will determine whether the submitted grievance falls within the scope of the grievance procedure. If this is not the case, the grievance office will inform the whistleblower of this fact and briefly explain the reasons for this decision.

III. Clarification of the facts

If the grievance falls within the scope of the grievance procedure, the [GESCO Group Grievance Office](#) will **discuss** the facts of the case with the complainant to gain a better understanding of the issues involved. The expectations of the complainant with regard to possible measures to prevent a violation of human rights or certain environmental goods (**preventive measures**) will also be discussed. If a violation of human rights or of certain environmental goods has already occurred, the [GESCO Group Grievance Office](#) will discuss with the complainant which measures he or she considers appropriate to prevent further violations or to mitigate the damage of violations that have already occurred (**remedial measures**). The knowledge gained from this serves as the basis for developing a solution to the grievance.

IV. Working out a solution with the whistleblower

The [GESCO Group Grievance Office](#) will subsequently develop a **proposal** for resolving the grievance through **preventive or remedial measures** as part of a continuous dialogue with the complainant.

V. Implementation of the agreed-upon measures

The GESCO Group company concerned will then implement the agreed-upon preventive or remedial measures.

VI. Review of the implemented measures and conclusion of the grievance procedure

The achieved result will then be evaluated by the [GESCO Group Grievance Office](#) together with the whistleblower.

VII. Following up and ensuring that no retaliatory measures are taken

The [GESCO Group Grievance Office](#) will monitor the situation to ensure that no retaliatory measures are taken against the complainant.

VIII. Diagram of the grievance procedure

1. Receipt of a grievance	2. Review of the grievance or tip	3. Clarification of the facts	4. Working out a solution with the whistleblower	5. Remedial measures	6. Review and conclusion	7. Effectiveness review
Receipt will be confirmed and documented to the person who provided the information.	The grievance will be examined and the further procedure and	The facts of the case will be discussed with the whistleblower and examined in	Based on step 3, a proposal for remedial action will be drawn up in consultation	The agreed-upon remedial measures will be implemented and followed up.	The achieved result will be evaluated together with the whistleblower.	The effectiveness of the procedure will be reviewed annually and on an ad hoc basis.

	responsibilities determined. If the grievance is rejected, the person providing the information will be informed about the reasons for the decision.	detail by the grievance office.	with the whistleblower.		The whistleblower/c complainant will be informed of the conclusion of the procedure.	If necessary, adjustments will be made to the process or corrective measures taken. Monitoring will be conducted to ensure that no retaliatory measures are taken.
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I. Is it possible to settle a dispute amicably?

GESCO SE does not offer an optional procedure for amicable dispute resolution. Rather, it makes reference to a decision on the official grievance procedure.

J. What qualifications does the GESCO Group Grievance Office have?

The [GESCO Group Grievances Office](#) is sufficiently qualified in terms of its personnel and professional suitability and its time availability to process the grievances received in accordance with these rules of procedure.

It is impartial and acts independently in the performance of its duties, i.e., free from directions. Furthermore, the [GESCO Group Grievance Office](#) is obliged to maintain confidentiality.

One of the ways in which the GESCO Group ensures that the requirements for such action are met is by ensuring that grievances are handled by fully qualified internal and external lawyers who are appointed as attorneys or in-house lawyers and who are professionally bound to impartiality, freedom from direction and confidentiality.

K. Which measures have been put into place to protect complainants from retribution?

GESCO Group companies have taken numerous measures to prevent complainants from being treated unfairly or penalized as a result of a grievance they submitted.

Among other things, the GESCO Group has made it very clear in the **Code of Conduct** and the **policy statement** related to the Supply Chain Due Diligence Act that it will not tolerate retaliatory measures taken against complainants as a result of grievances or tips. To underscore this position, specific **consequences** have been pledged. This action will be taken against members of GESCO Group companies or suppliers in the event that they expose whistleblowers to obvious reprisals or other unfair treatment.

L. How is the effectiveness of the grievance procedure ensured?

GESCO SE will review the effectiveness of this grievance procedure together with the [GESCO Group Grievance Office](#) **at least once a year** and **on an ad hoc basis**, in particular through feedback from the [GESCO Group Grievance Office](#).

Based on the grievance-procedure guidelines issued by the German Office of Economic Affairs and Export Control in October 2022, the effectiveness of the grievance procedure is assessed on the basis of the following **two key questions**:

- 1. To what extent does the procedure enable and encourage relevant target groups to submit reports even before a breach of duty has occurred?*
- 2. And to what extent does the procedure help prevent harm to whistleblowers or provide appropriate remedies for actual breaches of duty?*

GESCO SE will review these key questions with the help of the following **key figures** in particular:

- Number of grievances,
- Global and regional allocation of grievances, taking into account the specific supply chains,
- Information on the accessibility of the grievance channels (technical, linguistic, etc.),
- Type of grievance (e.g., frequent reports of certain risks, violations),
- Types of complainants (accumulation of certain groups of people, e.g., own employees, employees of direct or indirect suppliers, etc.),
- Average time taken to resolve a grievance,
- Complainant satisfaction with the handling of the grievance.

The findings on the effectiveness of the grievance procedure will be included annually in the report on the supply chain due diligence act.

M. Does the grievance procedure respect data protection, confidentiality and anonymity?

I. Data protection

Insofar as personal data is collected as part of the grievance procedure, it is collected, processed, transmitted and stored in compliance with **data protection regulations**. In accordance with Section 10, Paragraph 1 of the supply chain due diligence act, this data is documented and stored securely.

II. Confidentiality, anonymity

Complaints and information will be treated **confidentially** throughout the entire grievance procedure.

The **identity of the complainant** will not be disclosed to GESCO Group companies or suppliers of GESCO Group companies if the complainant does not wish his or her identity to be disclosed. Identity protection is ensured even after the grievance procedure has been completed.

However, identity protection **cannot** be granted if the disclosure of the identity is unavoidable due to a **legal obligation** (e.g., in the context of criminal proceedings).

The information provided by the complainants **may** also serve as a **basis** for **internal investigations** at the GESCO Group companies affected by the grievance or **external investigations** at the suppliers of the GESCO Group companies affected by the grievance.

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