



Intelligent Door Solutions

Novoferm GmbH, Postfach 1162, 46450 Rees

Novoferm GmbH

Isselburger Straße 31, 46459 Rees
Telefon: (0 28 50) 910-0, Telefax: (0 28 50) 910-646
Info: 0800-66 86 33 76 (Novoferm)
E-Mail: vertrieb@novoferm.com
Internet: www.novoferm.com

Rules of procedure for the complaints procedure under the Supply Chain Due Diligence Act (Section 8 (2) LkSG)

§ 1 Purpose and objects of the rules of procedure

Novoferm Germany GmbH is aware of its social responsibility and in this awareness has issued rules of procedure for its German affiliated companies, its associated companies, operating sites and branches, in which the procedure required by § 8 LkSG is described, which must be carried out if a person submits a complaint within the meaning of § 2 of these rules of procedure to Novoferm Germany GmbH.

§ 2 Complaint

A complaint is deemed to exist if reference is made to human rights and environmental risks as well as to violations of human rights-related or environmental obligations that have arisen as a result of the economic activities in the own business area of the decentrally managed Novoferm Germany GmbH, its affiliated companies, its associated companies or one of its direct suppliers (§ 8 para. 1 LkSG).

§ 3 Form and language of the complaint, complaint channels

3.1 Novoferm Germany GmbH accepts complaints that are submitted in writing, text form or verbally.

3.2 Complaints can be sent to the Compliance Officer as the complaints officer, in particular by post to the following address

Compliance Officer Novoferm Germany GmbH,

CFO Jan Hülsmann

Isselburger Straße 31, 46459 Rees-Haldern

or

by Mail: compliance@novoferm.com

Bankverbindungen:
Commerzbank Duisburg
IBAN: DE74 3504 0038 0583 3942 00
BW Bank/LBBW Stuttgart
IBAN: DE37 6005 0101 7406 5023 87

BIC: COBA DE FF XXX
BIC: SOLADEST

Novoferm GmbH
Sitz: Isselburg
Amtsgericht Coesfeld HRB 7771
USt-IdNr.: DE 811 152 143
Geschäftsführer: Dipl.-Ing. Rainer Schackmann, Vorsitzender;
Dipl.-Kfm. (FH) Jan Hülsmann

or submitted electronically via the complaints portal. Complaints can be submitted electronically via the complaints portal on the central website:

<https://novoferm.com/complaints-page-supply-chain-due-diligence-act>

of Novoferm Germany GmbH. The complaint does not become inadmissible if it is submitted by any other means.

3.3 A complaint must be written in German, English, Dutch, Spanish or in the language of a country in which the affiliated company, an associated company or branch has its registered office or in which a permanent establishment of Novoferm Germany GmbH or its affiliated companies is located.

§ 5 Disposition of the appeal

The appellant may at any time extend the appeal, limit it to individual appeal items or withdraw it. In the event of restriction or withdrawal, the proceedings will not be continued in this respect. However, Novoferm Germany GmbH is at liberty to clarify the facts of the case despite the withdrawal and to implement the necessary measures.

§ 6 Complaints officer

6.1 Complaints officers within the meaning of Section 8 (3) LkSG are the compliance officers of Novoferm Germany GmbH. These persons are, insofar as they fulfill tasks as complaints officers, independent of the instructions of the management. They guarantee impartial action. They are obliged to maintain confidentiality.

6.2 The respective complaints officer shall conduct the procedure in accordance with these Rules of Procedure. Insofar as these Rules of Procedure do not contain any provisions on specific procedures and decisions, the Complaints Officer shall determine the progress, the manner in which the procedure is conducted or the termination of the procedure at his reasonable discretion.

§ 7 Confirmation of receipt and communication channels

7.1 As soon as the complaint (§ 2) has been received by the management, the complaints officer or the complaints office, the complaints officer shall immediately confirm receipt of the complaint to the complainant.

7.2 The complaints officer may combine this confirmation with the information that the complaint is admissible. The confirmation may also be combined with the information pursuant to § 8.1. or § 8.2.

7.3 In all cases, the confirmation must be accompanied by the information that the complaints officer will provide further information after four weeks at the latest.

7.4 Communication between the complaints officer and the complainant shall be carried out by means of a message via the complaints portal, unless the complainant chooses another method.

7.5 The complaints officer will only communicate with the complainant if the complainant has opened a communication channel and can be reached. If the complainant communicates by email via the complaints portal, the complaints officer will reply to the email address known to him/he

§ 8 Examination of the admissibility of the complaint

8.1 Upon receipt of the complaint, the complaints officer shall check whether there is a notice that meets the requirements of § 2. If this is not the case, the complaints officer shall give the complainant the opportunity to supplement the notice within a period of no less than two weeks.

8.2 If the content of the complaint is sufficient for Novoferm to conduct its own internal investigation, the complaints officer will take appropriate investigative measures. If the clarification measures lead to the result that the complainant's information meets the requirements of § 2, taking into account the facts established, the complaint is admissible.

8.3 If the measures pursuant to § 8.1 and § 8.2 do not lead to the assumption of an appropriate notice within the meaning of § 2, the notice shall be deemed inadmissible. The complainant shall be informed of this at least in writing.

8.4 The complaints officer will finally inform the complainant if the complaint is not admissible. The decision will be substantiated.

§ 9 Procedure for admissible complaints

9.1 In the event of an admissible complaint, the Complaints Officer shall use reasonable legal and factual means to verify whether there is a human rights or environmental risk or violation.

9.2 When conducting the review in accordance with § 9.1 due to an indication of risks and violations in its own business area, the Complaints Officer may contact the internal operating sites concerned and request information from employees. He may also seek clarification by means of experts, inspections and documents.

9.3 When conducting the review in accordance with § 9.2. due to an indication of risks and violations caused by the actions of a direct supplier, the complaints officer can ensure appropriate clarification through the mediation of the responsible specialist departments.

9.4 If this appears necessary, the complaints officer may obtain further information from the complainant.

9.5 The complaints officer will discuss the facts of the case with the complainant (§ 8 para. 1 LkSG).

9.6 In the event that the complainant has not been affected by the realization of the alleged risk or is not affected in his rights by the violation, the complaints officer shall decide whether and to what extent he will inform the complainant about the remedial measures to be taken or taken by the company and special preventive measures. In doing so, he will consult with the management and protect any business and trade secrets.

9.7 In the event that the complainant could be injured by the realization of the risk or is already affected in his rights by the violation, the Complaints Officer will attempt to discuss the possible remedial and preventive measures with the complainant in order to jointly define one or more measures. As soon as the complaints officer considers this attempt to have failed, he or she will propose to the management the measures to be taken in his or her view and inform the complainant of the management's decision and of the implementation of the measure. Provisional measures can also be implemented immediately in the event of imminent danger.

9.8 Any civil law claims of the complainant remain unaffected by this procedure. However, the complainant may suggest to the Complaints Officer that the latter draw up a proposal that provides for a settlement between the company and the complainant whose rights have been violated. If such a suggestion is taken up by the Complaints Officer, his proposal will be submitted to the complainant and the management for acceptance and signature.

9.9 In the case of an admissible complaint, the Complaints Officer will send the complainant a reasoned final report when he has decided that the procedure has been concluded.

§ 10 General procedural principles

10.1 The confidentiality of the complainant's identity is guaranteed.

10.2 This complaints procedure offers the complainant protection against discrimination or punishment by Novoferm Germany GmbH, its affiliated companies, associated companies, branches and operating sites. There must be no discrimination or punishment on the grounds of a complaint.