

Rules of procedure

for complaints under § 8 of the German Act on Supply Chain Diligence Obligations (*Lieferkettensorgfaltspflichtengesetz – LkSG*).

In the interests of readability the male form is used in the following text. However, the obligations apply for all persons of whatever gender.

These rules of procedure have been approved by the management of Rhenus Automotive SE and include the following provisions:

§ 1 Purpose and subject of the rules of procedure

Under § 8 LkSG the management of Rhenus Automotive SE must issue rules of procedure for itself and its affiliates, business establishments and branches that lay down the procedure required under § 8 LkSG to be carried out if a person submits a complaint to Rhenus Automotive SE.

§ 2 Subject of complaints

A complaint is deemed to exist if risks or violations relating to human rights or the environment are reported that have arisen through the business activities of Rhenus Automotive SE, its affiliates or one of its direct suppliers (§ 8 par. 1 LkSG) in their area of business.

§ 3 Form and language of complaints

3.1. Rhenus Automotive SE shall accept complaints submitted in writing, text form or orally. Complaints should be submitted to the management of Rhenus Automotive SE or the Compliance Officer acting as the complaints officer.

3.2. Complaints should be submitted via the complaints portal (complaints submission point). Complaints are not admissible if they are submitted via a different channel.

3.3. Complaints must in German, English, Dutch or Spanish or in the language of a country in which an affiliated company or branch has its registered office, a business establishment of Rhenus Automotive SE or its affiliates is located or a direct supplier of Rhenus Automotive Group has a business establishment.

§ 4 Entitlement to submit a complaint

Any natural or legal person is entitled to submit a complaint, irrespective of whether their rights are affected by the risk or violation relating to human rights or the environment. If the person is a minor, they must be represented by their statutory representatives with regard to the complaint and in the proceedings.

§ 5 Dispositions regarding the complaint

The complainant may at any time extend the complaint, limit it to individual issues or withdraw it. In the event that the complaint is limited or withdrawn, the proceedings shall be discontinued. Rhenus Automotive SE shall still have the right to clarify the matter and on that basis implement the necessary measures.

§ 6 Complaints officer

6.1. The complaints officer in the meaning of § 8 par. 3 LkSG is the Compliance Officer of Rhenus Automotive SE. That person, insofar as he performs tasks as a complaints officer, is independent of the management's instructions. He provides a guarantee of impartial action.

6.2. The complaints officer conducts the proceedings according to these rules of procedure. Insofar as these rules of procedure do not include provisions on particular processes and decisions, the complaints officer shall decide, according to his reasonable discretion, about the progress and termination of the proceedings and how it is implemented.

§ 7 Confirmation of receipt and means of communication

7.1. Once the complaint (§ 2) has been received by the management, the complaints officer or the complaints submission point, the complaints officer shall promptly confirm the receipt of the complaint.

7.2. The complaints officer may also state in that confirmation that the complaint is admissible. That confirmation may also include the information referred to in § 8.1 or § 8.2.

7.3. In any event, a notification must be attached to the confirmation stating that the complaints officer will provide further information no later than within four weeks.

7.4. Communication between the complaints officer and the complainant shall, unless the complainant selects a different channel, be conducted by e-mail via the complaints portal. The complainant may also select a different communication channel:

a) communication by letter to the complaints at the following address:

Confidential Dr. Manfred Brüning
c/o Rhenus Automotive SE
Theodor-Althoff-Str. 39
45133 Essen
Germany

b) telephone communication with the complaints officer on + 49 (0) 172 680 5857

7.5. The complaints officer shall only communicate with the complainant if he has opened a channel of communication and can be contacted. If the complainant communicates by e-mail

via the complaints portal, the complaints officer shall reply to the e-mail address known to him.

§ 8 Assessing the admissibility of complaints

8.1. After the receipt of the complaint, the complaints officer shall verify whether it constitutes a notification that fulfils the requirements under § 2. If this is not the case, the complaints officer shall give the complainant the opportunity to supplement the notice within a time limit of no less than two weeks.

8.2. If the complaint is sufficient in terms of its content for a Rhenus internal clarification to be carried out, the complaints officer shall attempt to implement appropriate clarification measures. If the clarification measures lead to a finding that, taking into account the established circumstances, the notice submitted by the complainant fulfils the requirements under § 2, the complaint shall be deemed admissible.

8.3. If the measures under § 8.1 and § 8.2 do not lead to the conclusion that the notice is appropriate in the meaning of § 2, it shall be deemed inadmissible. The complainant shall be informed in writing.

8.4. The complaint shall also be deemed inadmissible if the complainant fails to disclose or substantiate his identity.

8.5. The complaints officer shall then give final notification to the complainant that the complaint is inadmissible. The grounds for the decision must be stated.

§ 9 Procedure in the event of an admissible complaint

9.1. In the event of an admissible complaint, the complaints officer shall assess, using legal and factual means being reasonable for him, whether a human rights or environmental risk or violation exists.

9.2. When carrying out the assessment referred to in § 9.1 due to a notification concerning risks or violations in the company's area of business, the complaints officer may contact the affected internal business establishments and request information from employees. He may also clarify the matter through expert assessments, visual inspection or documents.

9.3. When carrying out the assessment referred to in § 9.2 following a notification of risks or violations due to actions of a direct supplier, the complaints officer may clarify the matter using the means available, with the Head of Purchasing of Rhenus Automotive SE acting as an intermediary.

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

9.5. The complaints officer shall discuss the matter with the complainant (§ 8 par. 1 LkSG).

9.6. In the event that the complainant would not be affected by the realisation of the alleged risk or his rights are not affected by the violation, the complaints officer shall decide whether and to what extent he informs the complainant about the corrective measures and special

preventive measures that have been or will be taken by the company. In this context he shall consult with the management and protect any business or company secrets.

9.7. In the event that the complainant could be injured due to the realisation of the alleged risk or his rights have already been affected by the violation, the complaints officer shall endeavour to discuss with the complainant the corrective and preventive measures under consideration in order to jointly define one or more measures to be implemented. Once the complaints officer considers that that attempt has failed, he shall propose to the management the measures that in his view should be carried out and inform the complainant about the management's decision and about the implementation of those measures. If delay would give rise to a risk, provisional measures may also be carried out immediately.

9.8. Any civil law claims of the complainant remain unaffected by this procedure. However, the complainant may suggest to the complaints officer that he prepare a proposal that provides for a settlement between the company and the complainant whose rights have been violated. If such a suggestion is accepted by the complaints officer, he shall submit his proposal to the complainant and the management for approval and signature.

9.9. In the event of an admissible complaint, the complaints officer shall send the complainant a final report with a justification once he has decided that the proceedings have been completed.

§ 10 General procedural rules

10.1. The complainant's identity must be kept confidential.

10.2. This complaints procedure offers the complainant protection against discrimination or punishment by Rhenus Automotive SE or its affiliates, branches or business establishments. A complaint must not give rise to any discrimination or penalties.

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