

RULES OF PROCEDURE



for the reporting channels of SCHUNK Group

In order to successfully live our claim – Hand in hand for tomorrow – the most important precondition is that all employees have the same understanding of our corporate values, standards of conduct and legal requirements.

For us, managers and employees of the SCHUNK Group ("SCHUNK"), respectful and trusting cooperation, our values, but also the conscious perception of social and ethical responsibility, in addition to the quality of our work, form the basis for the success of our company. We can only exercise social and ethical responsibility if we ensure that unfair behavior by SCHUNK managers and employees of the entire SCHUNK company is excluded.

In order to give employees, affected parties or third parties the opportunity to draw attention to potential grievances or risks, SCHUNK has created several contact points for which these rules of procedure are authoritative.

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1. Basic procedural notes

When do these Rules of Procedure apply?

These Rules of Procedure take effect upon publication. They will be reviewed as part of an annual compliance risk analysis and amended if necessary.

What methods are governed by these rules of procedure?

These rules of procedure regulate the reporting/complaint procedures of SCHUNK SE & Co. KG, which are suitable for submitting reports on possible violations of laws or regulations within the group of companies or along the supply chain.

How are whistleblowers protected?

Whistleblowers enjoy special protection at SCHUNK. The contents of the report are treated confidentially and are only made available to the extent necessary persons.¹ In addition, the provisions of the EU-Whistleblower-Directive and the relevant national laws naturally apply.

Reprisals or discrimination as a result of a report are prohibited and will be investigated and sanctioned appropriately in each individual case. The same applies to employees who attempt to prevent a report or who breach the confidentiality of the identity of whistleblowers.

We would like to point out that SCHUNK may be obliged to disclose individual data within the framework of statutory or official disclosure or reporting obligations.

¹ Note: The confidentiality of the identity of whistleblowers, their supporting persons and all persons named in a report must be maintained by the persons making the report. The statutory exceptions apply here, for example in the case of an intentionally or grossly negligently incorrect report or a claim for information by a law enforcement agency.

2. Reporting channels

Which reporting channels are available?

You can submit your report via the following reporting channels:

Via e-mail: compliance@de.schunk.com

By post: SCHUNK SE & Co. KG
Compliance-Hinweisgebersystem
Bahnhofstraße 106-134
74348 Lauffen am Neckar

Reporting system: <https://schunk.integrityline.app/>

All employees are free to choose one of the reporting channels described. However, for anonymous reports, we recommend submitting a report via the electronic whistleblower system. This gives us the opportunity to ask questions and communicate anonymously with the whistleblower.

Who can submit a report?

Any natural person can submit a report on potential risks and/or misconduct at SCHUNK or along the supply chain. The use of the reporting channels is free of charge. However, we would like to point out that SCHUNK does not assume any costs incurred, such as connection costs, travel costs for personal reports or costs incurred for prior legal advice.

What issues can I report?

You can report issues in the following categories:

- Harassment and discrimination
- Fraud
- Conflict of interest
- Product safety
- Protection of personal data
- Other violations of the Code of Conduct
- Violation of human rights
- Bribery and corruption
- Financial crime, e.g. money laundering
- International trade controls / export regulations
- Rights and protection of persons
- Heavy environmental damage
- Due diligence in supply chains
- Antitrust problems, competition law

We would like to expressly point out that customer concerns regarding product-related or service-related complaints will neither be processed nor forwarded in connection with the reporting channels specified in these rules of procedure. In such cases, please contact info@de.schunk.com directly.

3. Rules of procedure

How to report a tip and who is processing it?

SCHUNK offers various internal company reporting channels. You will find an overview below:

- **Compliance-E-Mail-adress** – compliance@de.schunk.com

The Legal & Compliance team processes incoming messages. The mailbox is subject to restricted access rights. Reports can be submitted in writing in German and English around the clock and all year round.

- **Electronic reporting system "SCHUNK-Integrity Line"** – <http://schunk.integrityline.app>

The web-based reporting portal Integrity Line is provided by EQS, an external service provider. The system technically ensures the anonymity of the whistleblower. Incoming reports are processed by the Legal & Compliance team. The Legal & Compliance team can be communicated with on an ongoing basis via login and chat function, even anonymously. A report can be made in German, English, Turkish, Chinese or Spanish around the clock and all year round.

- **SCHUNK-Compliance-Manager**

Reports can be addressed to the SCHUNK-Compliance-Manager by letter, e-mail or telephone. A personal appointment can also be arranged. A report can be made in German or English. The Legal & Compliance team may be involved in the process of reports and questions addressed directly to the SCHUNK-Compliance-Manager, unless expressly requested otherwise.

Note: The Legal & Compliance team is obliged to maintain the confidentiality of the identities of the whistleblowers and all persons named in the reports. When processing a report, the Legal & Compliance team always acts discreetly, independently and impartially, so that independent completion of the tasks within the framework of the whistleblower system is guaranteed.

If necessary, other departments can be entrusted with investigative work for the internal clarification of the facts. The persons involved here are also subject to the above-mentioned principles.

What happens after my report?

Depending on the reporting channel you have selected, we will confirm receipt of your report electronically within 7 days, if we are actually able to do so. If your report is made anonymously and without providing contact details, we will unfortunately not be able to send you a confirmation of receipt.

After we have received a report, we first carry out a **plausibility test**. As part of this testing, we check whether the report is possible, plausible and convincing. As part of the plausibility test, we will contact you if it is possible for us to do so, should we require further information from you. If a report is implausible, you will receive feedback from us, if possible. If the report is plausible after an initial review, the facts will be clarified.

The **clarification of the facts** creates the basis for the initiation of possible follow-up measures. As a rule, it covers the review of company documents as well as the hearing of the accused. In detail, however, the clarification of the facts is highly dependent on the facts of the case, the scope of the report and the severity of the violation. If the reported suspicion is not substantiated during the investigation, the case will be closed and no further action will be taken. The whistleblower will be informed if we are actually able to do so.

Follow-up measures are taken if violations of laws or internal directives are identified during the investigation. In all cases, follow-up measures are agreed with the HR department and the line manager of the person concerned. In addition to measures under employment law (appraisal interview, warning, reprimand, dismissal), these may also include forwarding the results of the investigation to the criminal prosecution authorities. Follow-up measures always pursue the goal of adequately preventing a repetition of the violation. They are therefore highly dependent on the individual case. The whistleblower will finally be informed about the follow-up measures taken if this is actually possible for us.

The duration of such a method can vary depending on the facts of the case. SCHUNK endeavors to clarify all reports as quickly as possible. We ask for your understanding if it takes up to several months to clarify the facts. In any case, you will be informed of the interim status three months after receipt of the confirmation of receipt, provided you have submitted your report via the electronic whistleblower system or we know your contact details.

Who can see my report and who checks my message?

Reports via the above-mentioned channels can only ever be viewed by the Compliance department. In the event of a clarification of the facts, this department may seek support from the specialist departments in individual cases, for example to gain insight into documents or similar. However, the group of persons informed is always reduced to the minimum required.

In cases of breaches of due diligence in supply chains, the responsible officers from the Purchasing department are also automatically involved.

How long will it take to check my report?

As described above, it is not possible to give a general duration of a method. However, you will always receive confirmation of receipt of your notification within seven days, if actually available, as well as a final notification that the method has been completed.

4. Practical guidance

I have no solid evidence for my report – can I still submit a report without hesitation?

If you have a suspicion, you do not have to collect evidence to prove it. This is expressly the task of the company's compliance-manager. You therefore do not need any solid evidence for your report.

However, we would like to expressly point out that deliberately false suspicions or jokes are not permitted and may be prosecuted and sanctioned in heavy cases.

If you are unsure whether your suspicion is sufficient for a report, you can use the following hypothetical questions as a guide:

How would the press report it if your suspicions were confirmed and became public?

If this would result in negative reporting about the company or its employees, you should report your suspicions.

Would you tell your family immediately if the suspicion related to you and was true?

If you cannot immediately answer "yes" to this question, you should report your suspicions.

What would be the consequence if your suspicions are correct and no one makes a report?

If further violations are imminent, you should report your suspicions. If you are struggling with remorse if you do not report, you should report your suspicions.

How do I formulate my message?

Base your message on the KISS principle: "Keep it short and simple". Limit yourself to the essential information and avoid rambling or distracting statements or filler words. Describe the facts as specifically as possible in chronological order. Use short, concise kits for this. This is the best way to avoid misinterpretation of your report.

What do I have to pay attention to in my report if I want to remain anonymous?

In this case, please select the reporting channel of the electronic whistleblowing system if possible. This is the only reporting channel that enables completely anonymous communication with you even after your report. Postal reporting also allows you to remain anonymous. Avoid handwritten reports on this channel if possible. Please note that in this case no further communication is possible and you will not be able to receive any further information about the investigation procedure.

If you wish to remain anonymous, please also ensure that you do not submit your message from a SCHUNK device. Avoid linguistic nuances that you frequently use in everyday life and by which you could be recognized. Also make sure that any attachments you include with the report do not allow any conclusions to be drawn about you personally.

5. Data protection information in accordance with Art. 13 and Art. 14 GDPR

Information on how we handle your data when you use our reporting channels can be found [here](#) or at <https://schunk.com/de/en/global/privacy-policy>.

If you have any further questions about data protection, please contact the data protection officer at dataprotection@de.schunk.com.