

RULES OF PROCEDURE

on the complaints procedure pursuant to § 8
of the Supply Chain Due Diligence Act (LkSG)

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Introduction

In order to live up to our social responsibility, ASW is committed to acting sustainably and responsibly. In the course of our business activities, we place particular emphasis on respecting human rights and protecting the environment.

ASW explicitly encourages and supports its employees, business partners, suppliers, employees of suppliers, and third parties to report any human rights or environmental risks or violations of duty.

Scope of the complaints procedure

The complaints procedure serves to identify human rights and environmental risks and violations of duty that have arisen as a result of the business activities of ASW or a supplier.

Process of the complaints procedure

The ASW Human Rights Officer inspects the information and complaints/tips received in accordance with the process outlined below:

1. Receipt

The complaint/tip-off is received by ASW via one of the listed reporting channels.

2. Confirmation of receipt and documentation (approx. 7 days)*

Receipt of the complaint or tip-off will be acknowledged to the person making it (also referred to as 'the whistle-blower').

3. Examination (approx. 14 days)*

Whether the complaint is justified is examined, which determines the subsequent procedure. In the event of a refusal, the whistle-blower shall receive a statement of reasons.

4. Clarification and development of a solution (approx. 30 days)*

The facts of the case are discussed and examined with the whistle-blower and a proposal for remedial action is drawn up.

5. Remedial action (approx. 60 days)*

The agreed measures for remedial action are implemented and followed up.

6. Review and completion (approx. 30 days)*

The result achieved is discussed together with the whistle-blower.

* The time frame serves as a guideline. It may vary depending on the scope and number of participants.

Contact

The LkSG Officer at ASW is Mr Stefan Schmidt. He is the point of contact and responsible for addressing any human rights or environmental risks or their respective violations.

Complaint channels

In order to make the process accessible to everyone, we have created various ways to file complaints:

(The complaint can be made anonymously)

Contact:



Mr Stefan Schmidt

By letter:

Adolf Schmidt Metallwaren- und
Holzschraubenfabrik GmbH
Mr Stefan Schmidt
Essener Straße 39
42327 Wuppertal

By e-mail:

lksg@asw24.de

Personal:

If you wish to report in person, please make an appointment in advance with Mr Stefan Schmidt via e-mail at lksg@asw24.de or by telephone on 0202-69518-0.

By internal mail:

'Personal' mailbox

Via the LkSG contact form on our website:

www.asw24.de/lksg

Content of the complaint

By providing the following voluntary information, you will help us to process your complaint effectively:

- **Contact details:**

Name and contact details of the whistle-blower and, if different, of the subject of the complaint

- **Location of the incident:**

Where did the incident occur (e.g. in which country, in which production facility, at which supplier)?

- **Alleged offence:**

Citation of the human rights or environmental risk or violation of duty (brief description of the facts, date/time and any evidence)

- **Scope:**

How many people are affected?

- **Concerns:**

What would the whistle-blower do to remedy the situation?

- **Confidentiality:**

Indication of whether ASW should handle the complaint confidentially or transparently

- **Further information:**

e.g. naming organisations that have further knowledge or evidence regarding the complaint or naming local specificities of ethnic, cultural or political culture that have an impact on the facts of the case

Protection of the whistle-blower

Protecting whistle-blowers from being disadvantaged or penalised as a result of complaints or whistle-blowing is an essential part of our complaints procedure. Intimidation and reprisals against people who report actual or suspected misconduct in good faith will not be tolerated.

Throughout the length of the process, the identity of the whistle-blower will only be known to the employees responsible for handling the complaint or tip-off.

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