

Procedural Rules for the Whistleblower System

1. Purpose and Scope of Application

This procedural regulation governs the complaints procedure in accordance with Section 8 of the German Supply Chain Due Diligence Act (LkSG) for H. & J. Brügggen KG. It serves the confidential and effective receipt, processing, and documentation of reports concerning actual or potential human rights or environmental risks, as well as violations of human rights-related or environmental obligations.

The procedure may be used in particular for reports relating to matters falling within the scope of Section 2, Paragraphs 2 and 3 of the LkSG. These include, among others, violations of:

- Freedom of association and the right to collective bargaining
- Prohibition of child and forced labor
- Equal treatment and non-discrimination
- Adequate working conditions, including occupational safety, wages, and rest periods
- Environmental protection obligations, especially in connection with mercury, chemicals, waste disposal, and water pollution

2. Access and Complaint Channels

Reports or complaints can be submitted via the whistleblower system publicly accessible on our company website. Access is barrier-free and available to all internal and external stakeholders, including employees, suppliers, affected individuals, business partners, civil society organizations, and the interested public.

Use of the system is voluntary, anonymous (if desired), and compliant with data protection regulations.

Access to the whistleblower system:

[Whistleblower system form - H. & J. Brügggen KG](#)

3. Procedural Flow

a. Submission and Receipt of Complaints

A stakeholder reports an actual or suspected violation of applicable legal regulations, internal company policies, or recognized human rights or environmental standards via the whistleblower system on our homepage.

Upon receipt of the report:

- The responsible complaint manager automatically receives a notification.
- Within seven (7) calendar days, a standardized acknowledgment of receipt is sent via the whistleblower mailbox to the reporting person's email address by the complaint manager or a delegated member of the reporting team (§ 17 (1) No. 1 HinSchG).

b. Review of Substantive Scope

After the complaint is received, the complaint manager conducts a preliminary review to determine whether the reported matter falls within the substantive scope of § 2 HinSchG and § 2 LkSG. Reports that do not meet this criterion are documented accordingly and closed.

c. Forwarding and Processing

If relevant, the report is classified for further processing. The associated metadata (e.g., category, urgency, status) is updated. The report is then assigned to a subject matter expert, who conducts the investigation and, if necessary, initiates remedial measures.

4. Confidentiality and Protection of Whistleblowers

All received reports are treated with strict confidentiality. The identity of the whistleblower is preserved – if so desired. Retaliation against whistleblowers is expressly prohibited. H. & J. Brügggen KG is committed to complying with the requirements of the Whistleblower Protection Act (HinSchG) and data protection regulations in accordance with the GDPR.

5. Documentation and Follow-up

All complaints are documented and retained in accordance with legal requirements. The processing history and any measures taken are documented in a comprehensible manner. Upon request, the whistleblower will be informed of the outcome, provided this is legally permissible and possible.