

PROCEDURE FOR COMPLAINTS PROCESS

The STRATEC Group – hereinafter referred to as STRATEC – assumes responsibility for ensuring that its people treat each other fairly and with respect, for complying with laws and regulations, and for respecting and reinforcing human rights. Alongside STRATEC's Corporate Compliance Policy, its Human Rights Strategy, and its Policy Statement on Human Rights, one core aspect of this responsibility involves establishing an effective complaints process to address notifications received concerning relevant infringements.

This procedure offers information about key aspects of the complaints process, access to the process, the ways it can be reached, and the relevant responsibilities.

PURPOSE OF COMPLAINTS PROCESS

The complaints process is intended to enable any person or group of persons to submit relevant complaints or notifications to STRATEC and thus make the company aware of any actual or potential misconduct or infringements of rights, as well as of any human rights-related or environmental risks (early warning system).

This possibility of informing the company of suspected infringements of rights is intended to ensure that any damages can be directly averted or minimized (access to appropriate remedy).

ADDRESSEES OF THE COMPLAINTS PROCESS AND OBJECT OF COMPLAINTS

Any person may submit complaints and notifications, irrespective of whether they do so from within Germany or from abroad. The object of a complaint may involve notifications of potential or actual infringements of rights or misconduct. Furthermore, complaints may also involve human rights-related or environmental risks or infringements of human rights-related or environmental obligations that arise due to STRATEC's economic activities either in its own area of business or in its supply chain.

SUBMISSION OF COMPLAINTS OR NOTIFICATIONS

Complaints and notifications may be submitted at any time using the following channels:

- Via the electronic notification tool on STRATEC's website: <https://report.whistleb.com/en/stratec>
- By e-mail to: compliance@stratec.com
- Intranet compliance postbox
- In person to the Compliance Officer

Irrespective of the channel by which they reach STRATEC, all complaints and notifications will be directly processed in the same way. All personal data and other sensitive disclosures are treated with strict confidentiality and only forwarded within the investigation team or to other persons when necessary to investigate the matter appropriately. Information communicated via the tool is encrypted and protected by passwords.

HOW STRATEC PROCESSES COMPLAINTS AND NOTIFICATIONS

Complaints and notifications are dealt with by the Compliance department and/or the ESG Board at STRATEC. They are processed

- impartially
- independently
- without instructions, and
- confidentially.

TIMELINE OF COMPLAINTS PROCESS

Once a complaint or notification has been received, the person submitting this information receives confirmation of receipt within a suitable deadline (generally within one week). Where possible and desired, the person processing the notification remains in contact with the person who submitted it throughout the entire process. The person submitting the notification can remain anonymous through the whole of the dialog for as long as he or she wishes.

As a general rule, the complaints or notifications are first reviewed centrally to enable the issue reported to be classified correctly (e.g. to assess whether it is a specific or actual infringement of rights, misconduct, a human rights-related or environmental risk or an infringement of human rights-related or environmental obligations). A review is also performed to ascertain which STRATEC company or which supplier the notification refers to.

The complaint or notification is then forwarded to the responsible body, e.g. within a STRATEC company. Depending on the type of misconduct suspected, the incident is investigated where applicable with support from other relevant departments at STRATEC (such as Human Resources).

The next step is to clarify the issue, a process which generally takes place within one month. If clarification of the issue establishes that an infringement or misconduct has taken place, remedial measures are initiated immediately.

Further down the line, a review is performed to ascertain whether and to what extent the remedial measures have been implemented. In addition, a proposal as to how to proceed is compiled based on the existing insights gained from clarifying the issue.

PROTECTION OF THE PERSON SUBMITTING THE NOTIFICATION FROM ANY DISADVANTAGES OR REPRISALS

One core element of the complaints process is the protection provided to persons submitting notifications against any disadvantages or disciplinary measures as a result of the complaints or notifications thereby submitted. This should be ensured with the following measures:

- All complaints and notifications are processed solely by employees specially trained and appointed for this purpose (compliance officers).
- All information such as personal data and other details that may reveal the identity of the person submitting the notification is treated confidentially. This continues to apply after the process has been completed.
- In line with legal requirements, internal company documentation is retained for seven years and then destroyed.

All employees and other representatives of STRATEC are strictly prohibited to determine the identity of persons submitting notifications. Any documented attempt to do so will be disciplined.