

Rules of procedure concerning complaints in accordance with Section 8 of the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz/LkSG)

With these rules of procedure, Ottobock SE & Co. KGaA (hereinafter “Ottobock”) provides information on how the complaints procedure is to take place under Section 8 of the German Supply Chain Act (LkSG). The complaints procedure is a key element in the fulfilment of human rights-related duties of care under the LkSG. It is used to give persons or groups of persons the opportunity to issue notifications or complaints about risks to human rights or the environment.

As an early warning system, it makes it possible to obtain information about risks or threats to human rights within the company’s own business area or within the supply chain, so that prompt, direct action can be taken and any imminent damage prevented. It also provides access to appropriate remedies for those affected in cases where infringements or damage have already occurred.

1. Who can submit complaints or information?

The complaints procedure is available to all persons or groups of persons who are directly and indirectly affected by human rights or environmental violations within Ottobock’s own business area or within Ottobock’s supply chains. These may include the following persons, for example:

- Ottobock employees
- Employees of (direct or indirect) suppliers and business partners
- Customers of Ottobock or their suppliers and business partners
- Relatives of employees
- Trade unions, non-governmental organisations and other organisations that are made aware of risks or damage and/or support those affected
- Residents in local areas

2. Which topics can be addressed?

Affected persons may submit notifications in the context of the complaints procedure if they wish to provide information about risks or threats to human rights. Risks to human rights are situations in which it is likely that prohibited conduct is imminent or has already occurred in respect of any of the following human rights:

- Child labour
- Forced labour
- Forms of slavery
- Disregarding occupational health and safety standards
- Disregard for freedom of association
- Discrimination and equality of employees
- Withholding a decent wage

- Violations of human rights through environmental damage
- Illegal forced evictions
- Violence by security forces

In addition, notifications of environmental damage may be submitted in cases where damage of this nature affects natural livelihoods; for example, because it affects access to or the quality of food, drinking water or sanitation, or health in general. This applies to:

- Harmful soil changes
- Water pollution
- Air pollution
- Harmful noise emissions
- Excessive water consumption

In addition, specific environmental risks may also be identified in the following cases:

- Prohibited use of mercury in manufacturing processes (as per the Minamata Convention on Mercury)
- Infringement of the prohibition or restriction of the manufacture and use of what are known as persistent organic pollutants (aldrin, chlordane, DDT, endrin, heptachlor, hexachlorobenzene, mirex, toxaphene) and industrial chemicals, as well as two groups of undesirable by-products: polychlorinated dibenzodioxins and dibenzofurans (as per the Stockholm Convention on Persistent Organic Pollutants)
- Violation of the requirement to minimise the transboundary movement of hazardous waste and to dispose of hazardous waste in an environmentally sound manner close to the point of origin (in accordance with the Basel Convention on the control of transboundary movements of hazardous waste)

3. How can complaints and information be reported?

The Reporting Office provides all employees, customers and business partners with the opportunity to report breaches of compliance. This allows us to resolve these issues internally and prevent damage to our customers or the company itself in future.

The Reporting Office consists of two channels. Information can be submitted to Ottobock worldwide anonymously and confidentially via the Reporting Office. A digital [whistleblowing portal](#) is operated for this purpose. The website also allows encrypted communication in the event of anonymous information. Ottobock has also appointed an external [Ombudsperson](#). The appointed attorney confidentially examines evidence of infringements and ascertains the facts as comprehensively as possible. They then forward their report to the Compliance department at Ottobock.

4. What happens to notifications and information?

Information can be submitted to Ottobock worldwide anonymously and confidentially via the Reporting Office. A digital whistleblowing portal is operated for this purpose. The content of information received via this system is reviewed for by the Compliance department and forwarded to the relevant specialist department.

In addition, Ottobock has appointed an external ombudsperson. The appointed attorney confidentially examines evidence of infringements and ascertains the facts as comprehensively as possible. They then forward their report to the Compliance department at Ottobock.

If a notification concerns a risk to human rights, it is relevant to the LkSG and is forwarded to the Human Rights Officer accordingly.

The Human Rights Officer then contacts the LkSG Coordinator, who attempts to gather all the essential information. If possible, this is done in contact with the whistleblower.

The whistleblower is informed of the outcome of this process of establishing the facts. The whistleblower is also informed in the event that the notification has not been followed up (for example, because the matter has already been dealt with, was already known about or is not plausible). The information they are given also states the reasons for this.

Based on the findings of the process of establishing the facts, the relevant specialist department draws up a proposal for remedial action. If it is found that the violation of human rights is imminent or is already taking place, appropriate preventive and corrective measures are taken immediately.

The Human Rights Officer verifies whether the remedial and preventive measures effectively resulted in risks being eliminated or minimised, and informs the whistleblower of this.

The Human Rights Officer and LkSG Committee are:

- Impartial
- Independent and not bound by instructions in the fulfilment of their tasks
- Free from conflicts of interest
- Appropriately trained for the task
- Qualified to deal with any content that complaints may contain

Equipped with sufficient time to process information and complaints promptly, and to understand the perspective of the whistleblower

5. How are whistleblowers protected?

From the beginning of the procedure and beyond this where possible, measures are taken to protect whistleblowers from discrimination or punishment resulting from submitting information:

- All information is treated strictly confidentially.
- Names, personal data or other information that allows conclusions to be drawn about the identity of the whistleblower are protected and are not passed on to persons outside the specialist department.
- The responsible persons are trained in handling and sensitized to confidential matters and data.
- If necessary, names are anonymised or pseudonymised to protect the whistleblower.
- The information and communication with whistleblowers are processed in a protected environment; in particular, this means they are processed in a way that ensures third parties do not have access to documents, are unable to listen to conversations and cannot otherwise obtain information.
- Even after the conclusion of the procedure, no information is disclosed if this is necessary to protect the person concerned.
- As far as possible, the technical department maintains contact with the whistleblower throughout the procedure and gives them the opportunity to provide information about threats or discrimination.