



KAEFER **Rules of Procedure** **for the Grievance** **Mechanism**

KAEFER. Count on us.



KAEFER

Preface

KAEFER has always placed great emphasis on corporate responsibility and a commitment to sustainability. Respect for human rights and the environment is a core value for us and plays a central role in our corporate culture and in the policies that guide our daily actions.

We have established an effective grievance mechanism through which human rights and environmental risks and violations can be reported as an expression of our commitment.

These Rules of Procedure provide information on access to, the procedure for, and the responsibilities of the grievance mechanism.

What is the purpose of the grievance mechanism?

The purpose of the grievance mechanism is to give any person or group of persons the opportunity to provide KAEFER with relevant information about human rights and environmental risks or violations, allowing us to avert or minimise negative impacts.

The grievance mechanism is free of charge and open to the public, regardless of whether it concerns KAEFER employees, employees in our supply chain or other affected stakeholders.

Grievances may concern human rights, like the prohibition of child labour, protection against slavery and forced labour, freedom from discrimination, protection against unlawful land expropriation, health and safety, freedom of association and collective bargaining, and protection against torture.

Environmental risks and violations like harmful soil or water pollution may also be reported.

How to submit reports?

Grievances can be reported at any time through a variety of channels. All reports, regardless of how they are received, are dealt with immediately and with the necessary confidentiality.

– Grievances may be submitted to the line managers or the KAEFER contact at the level closest to the subject matter.

– Information can also be submitted directly to:

Christopher Schröter
Group Chief Compliance Officer
Marktstrasse 2, 28195 Bremen, Germany
Phone: +49-421-30550
Email: Christopher.Schroeter@kaefer.com

– KAEFER also offers an electronic whistleblowing system (so-called Compliance Helpline) where information can be submitted through a web form. It is available free of charge in nine languages and allows the user to create a digital mailbox, enabling to communicate anonymously with us. The whistleblowing system can be accessed at:

<https://www.bkms-system.com/kaefer>

Reports are handled by selected and specially trained employees of KAEFER.

How does the grievance mechanism work?

– Once a report has been received, the whistleblower will receive an acknowledgement of receipt within seven days.

– Throughout the entire process, KAEFER will be in contact with the whistleblower, if this is desired and a contact point is available.

– The reports are first reviewed to determine whether the reported issue represents a human rights or environmental risk or violation. The report is then assigned to the responsible function at KAEFER (see illustration on the following page) to investigate the facts of the case (so-called investigation).

Grievance mechanism by different functions

Grievance raised	Nature of grievance	Investigation	Corrective measures	Control	Documentation	Reporting
Person submits a grievance to – KAEFER Compliance Helpline (BKMS System) – Line Manager – Local Compliance department – Local Human Resources department – Local Procurement department	Compliance case	Local Compliance Officer carries out investigation	Local Compliance Officer determines measures	Local Compliance Officer controls measures	Local Compliance Officer documents	Local Compliance Officer reports to Executive Board
	Grievance on management and labour relations	Local Human Resource department carries out investigation	Local Human Resources determines measures	Local Human Resources controls measures	Local Human Resources documents	
	Violation of Supplier Code of Conduct	Local Supply Chain Sustainability Officer carries out investigation	Local Supply Chain Sustainability Officer determines measures	Local Supply Chain Sustainability Officer carries out supplier audit	Supply Chain Sustainability Officer documents	

- We aim to complete the investigation within three months; if this is not possible, the whistleblower will be informed.
- If the fact-finding process reveals that a violation is imminent or has occurred, corrective action will be taken immediately. Where necessary, corrective action plans including responsibilities and time plans will be developed and implemented.
- The effectiveness of corrective measures will be reviewed.

How are whistleblowers protected from retaliation for reporting?

KAEFER will not tolerate retaliation against anyone who provides information or reports concerns in good faith – neither at KAEFER nor at our business partners.

Anyone at KAEFER, including supervisors or managers, who condones or participates in retaliation against an individual for reporting a concern in good faith will be subject to disciplinary action, up to and including termination of employment. Individuals who believe they are being subjected to retaliation because of their report should contact KAEFER immediately (see contact information above).

KAEFER also does not tolerate business partners subjecting employees to negative consequences because of their reports. We reserve the right to suspend or terminate business relationships.

The following measures are in place to protect whistleblowers:

- All information is processed by a small group of selected and specially trained employees.
- All information that could identify the whistleblower will be kept confidential. This applies even after the process has been completed.

If you have any questions about KAEFER's Rules of Procedures for the Grievance Mechanism, please contact our sustainability team:

esg@kaefer.com

To report a grievance, please use our reporting system:

<https://www.bkms-system.com/kaefer>



KAEFER SE & Co. KG

Corporate Strategy & ESG

Marktstr. 2

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Compliance Helpline:

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