

# Rules of Procedure for the Appeal Process pursuant to § 8 of the Supply Chain Due Diligence Act (LkSG)

## 1. Purpose and scope of application

These Rules of Procedure describe the procedure by which individuals may report human rights or environmental risks, as well as violations of the due diligence obligations under the Supply Chain Due Diligence Act (LkSG), within the business operations of Vogelsang GmbH & Co. KG.

The aim of the procedure is to identify and investigate potential or actual violations at an early stage and to implement appropriate preventive or corrective measures. In this way, we contribute to the respect for human rights and the protection of the environment throughout our entire supply and value chain.

This procedure applies to reports of human rights or environmental risks or violations as defined in § 2(2) of the LkSG, especially:

- Respect for human rights, e.g., prohibition of child labor, forced labor, and discrimination
- Occupational health and safety
- Environmental protection throughout the supply chain

This applies both to reports within Vogelsang's own business operations and to direct or indirect suppliers within the supply chain or value chain.

This policy is particularly addressed to employees, suppliers, business partners, service providers, customers, and other third parties associated with Vogelsang's business activities.

## 2. Reporting channels and reporting options

Whistleblowers can report potential violations or risks through the following channels:

- By email to: [hinweis@vogelsang.info](mailto:hinweis@vogelsang.info)
- By mail marked "confidential" to:  
Vogelsang GmbH & Co. KG  
Internal Reporting Office pursuant to the HinSchG  
Holthöge 10-1  
49632 Essen (Oldenburg)
- By phone: 05434-83-7987

These channels are available for reports submitted under both the Whistleblower Protection Act (HinSchG) and the Supply Chain Due Diligence Act (LkSG). All reports are treated equally and processed according to a standardised, confidential procedure. Further information on the reporting system can be found at <https://www.vogelsang.info/de/hinweis>.

### Anonymity and confidentiality

Whistleblowers can submit their reports anonymously. The confidentiality of the whistleblower's identity and the reported information is strictly maintained in all cases. Access to reports and related data is restricted exclusively to authorized personnel.

For anonymous reports, the option is provided to ask follow-up questions via an anonymous reply mailbox or technical mechanisms without revealing the identity of the person making the report. Anonymous reports are treated equally.

## **3. Responsibility and handling**

Management has designated an independent reporting office to receive and review incoming reports and coordinate their further handling. If necessary, an external ombudsman or specialist advisor may be consulted to ensure independence. All parties involved are bound by confidentiality.

### Procedure and initial review

Upon receipt of a report, the contact point will acknowledge receipt within seven calendar days. This is followed by an initial review to assess plausibility, competence, and relevance. If the review indicates that a human rights or environmental risk or violation may exist, an in-depth investigation will be initiated.

### Investigation, actions and feedback

As part of the investigation, the Whistleblower Office may involve internal departments or external experts to the extent necessary to clarify the matter. If actual risks or violations are identified, appropriate preventive or corrective measures are defined, implemented, and their effectiveness is reviewed.

The reporting person will receive feedback on the status or outcome of the investigation within three months of the report being received, to the extent that this is possible while maintaining confidentiality.

Employees of Vogelsang GmbH & Co. KG who, in the course of their work, violate human rights or environmental due diligence obligations, applicable law, the Code of Conduct, or other internal company regulations must expect appropriate disciplinary consequences.

## **4. Documentation, data protection and retention**

All incoming reports, investigative steps, and actions are recorded in a secure document.

Personal data is processed in accordance with the DSGVO (German Data Protection Act) and only to the extent necessary to handle the report. Access to the data is restricted exclusively to those individuals involved in the process. Thus, the personal data of the reporting individual is generally treated as confidential and not disclosed to third parties. However, if it becomes

necessary to disclose personal information to third parties due to a legal obligation or to further investigate the violation you reported, we will contact the reporting individual in advance.

The retention period is generally three years following the conclusion of the proceedings. Data will only be stored for a longer period if required by law or necessary for legal proceedings. Upon expiration of the retention period, the data will be deleted in accordance with data protection regulations.

## **5. Protection of whistleblowers**

Vogelsang provides protection to all whistleblowers who report concerns in good faith from any disadvantage, discrimination, or retaliation.

Protective measures include, in particular, confidentiality, technical access restrictions, and organizational safeguards.

However, a deliberate, malicious false report intended to harm a person may result in consequences under labor or civil law.

## **6. Interface for risk analysis and continuous improvement**

Any notice received is regularly taken into account as part of our risk analysis pursuant to § 5 of the LkSG. The findings from the complaint process are incorporated into the annual assessment of human rights and environmental risks and contribute to the continuous improvement of our risk management system.

Relevant findings are also recorded and evaluated in the annual report pursuant to § 10 of the LkSG to ensure the long-term effectiveness of our measures.

## **7. Review of the effectiveness of the appeals process**

The effectiveness of the complaint procedure is reviewed at least once a year, as needed, and whenever there are significant changes in the risk situation, and is adjusted as necessary. The results are incorporated into the ongoing improvement of the procedure. Necessary adjustments are implemented.