

Rules of procedure for complaints

Complaints procedure for the companies of Halbzellstoff-Industrie GmbH (hereinafter referred to as the HZI Group)

With these guidelines we, Papier- u. Kartonfabrik Varel GmbH & Co. KG, as a subsidiary company of the HZI Group, wish to establish and transparently communicate guiding principles for the handling of whistleblowers in accordance with German and European legislation in the area of whistleblower protection and the laws on supply chain diligence obligations.

The complaints procedure enables people to submit reports concerning legal violations or the abuse of rights in the area of public law, as well as to draw attention to violations of human rights and/or environmental obligations that have occurred due to the economic activities of a company in its own area of business or of a direct or indirect supplier.

1. Guidelines for whistleblower protection in the HZI Group

In our implementation of whistleblower protection, we are guided by current and future statutory provisions, taking into account both German and European requirements. Furthermore, we see a need to strongly link the provision of a whistleblower protection system with related issues such as the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG) in our compliance system.

2. Format of the complaints procedure: Internal reporting point and external ombudsperson service

The HZI Group has set up a system for reporting violations. We have decided to employ a platform solution as the internal reporting point:

<https://fp-whistleblowing.com/hzi>

There you will also find further information on data protection. Your report will go directly to our external ombudsperson service, FIRST PRIVACY GmbH in Bremen, Germany, which will handle it confidentially and forward it after an initial assessment to our internal compliance manager for further consideration. As a data protection officer and certified compliance officer FIRST PRIVACY GmbH provides the necessary expertise and is obligated to maintain confidentiality and protect your identity and personal data.

3. The complaints procedure: Processing reports

You can decide whether or not to disclose your contact details, which details you disclose and if you would like a response. If you would like a response and have given your contact details, you will receive a confirmation of receipt of your report within seven days via the means of communication specified by you. Within three months you will receive a notification detailing how your complaint is being handled and any measures taken.

4. Scope of applicability and examples

You may submit reports concerning legal violations or the abuse of rights in the following areas:

- Public procurement
- Financial services, financial products and financial markets, as well as the prevention of money laundering and financing of terrorism
- Product safety and conformity
- Road safety
- Environmental protection
- Food safety
- Animal health and public health
- Consumer protection
- Protection of privacy and personal data as well as the security of network and information systems
- Violations against the EU's financial interests within the meaning of Article 325 TFEU and in accordance with the more precise definitions in relevant EU measures.
- Violations of internal market rules within the meaning of Article 26 (2) TFEU, including violations of EU regulations on competition and state aid, as well as violations of internal market rules with regard to activities in breach of corporate tax regulations or with regard to agreements aimed at obtaining a tax advantage at odds with the objective or purpose of applicable corporate tax laws.
- All forms of violations of human rights or environmental obligations covered by Article 2 (2) and (3) of the German Supply Chain Act (including violations of freedom of association, failure to pay a reasonable wage, unequal treatment in employment or occupation)
- Bribery and corruption
- Theft
- Harassment, discrimination, violations of labor rights

Obviously irrelevant cases will be deleted without further processing or confirmation of receipt.

5. Training and communication

Regular training courses in the area of whistleblower protection and compliance are an integral part of the HZI Group's compliance system.

6. Reporting and monitoring

It is planned for a summary of activities in the area of whistleblower protection to be prepared once a year for reporting purposes. That report will become an integral part of our sustainability management, and thus part of our regular management review, in the course of which the effectiveness of the complaints procedure will be reviewed each year or as the need arises. From the reporting year 2024 onwards, the report will form part of the annual report to the competent authority, i.e. the Federal Office for Economic Affairs and Export Control (BAFA), in connection with the fulfilment of the diligence obligations under LkSG. Like all other documentation under LkSG, those reports will also be retained for seven years from the date they are drafted.

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The Managing Directors of Papier- u. Kartonfabrik Varel GmbH & Co. KG



Ralf Schu



Rolf Bauer