

Code of Procedures for Complaints in accordance with Section 8 (2) of the Act on Corporate Due Diligence in Supply Chains (LkSG)

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1. What is the purpose of this Code of Procedures?

This Code of Procedures describes the main characteristics of the complaints procedure in accordance with Section 8 (2) LkSG. This Code of Procedures provides whistleblowers with information regarding the specific bodies responsible for processing, the types of activities performed after a complaint or a report has been submitted, and indeed regarding the specific time frames involved, and also how whistleblowers are protected both during and after the procedure.

It is important that Wilo be informed about any potential misconduct or legal infringements committed by its own employees, sales partners or suppliers so that appropriate countermeasures can be implemented in a timely manner. Wilo can only fulfil its responsibilities here through open communication with our responsible bodies.

In this context, reports serve as a type of early warning so that the relevant parties can react promptly to risks and offences. Furthermore, anyone who reports an incident via Wilo's complaints procedure will receive access to an appropriate remedy, provided that they themselves are affected by the offence.

2. What falls within the scope of this Code of Procedures?

The complaints procedure described below is open to all persons worldwide who would like to submit reports or complaints within the scope of the Act on Corporate Due Diligence in Supply Chains.

The procedure therefore covers all reports concerning human rights and environmental risks and breaches of duty – relating to Wilo's entire supply chain.

The legal positions protected by the LkSG can be summarised as follows:

- Ban on child labour
- Ban on forced labour and slavery
- Health and safety within the workplace
- Freedom of association
- Ban on unjustified unequal treatment
- Appropriate remuneration
- Environmental contaminants
- Land rights
- Impairments caused by security forces

Reports can be submitted by anyone who discovers or suspects breaches or risks in the case of one of the aforementioned areas (so-called "protective positions"). This concerns breaches within the Wilo Group or at a direct or indirect supplier of Wilo.

Reports and complaints that fall outside the scope of the LkSG may be forwarded to other responsible bodies. This will be communicated to the whistleblower.

This Code of Procedures is supplemented by internal guidelines and procedural instructions. These set out who is responsible for making decisions on borderline cases, for example, or who is responsible for processing reports.

3. Submitting reports

3.1 How and where can reports be submitted?

Reports can be submitted at Wilo at any time, free of charge, over the phone, by postal mail or online via "SpeakUp!", an anonymous whistleblower system available in multiple languages around the world.

You can access the **whistleblower system** in your required language:



Online at: <https://www.speakupfeedback.eu/web/5ggznq>

After calling up the SpeakUp web service page (via a hyperlink or by entering the URL), you select the required country, receive an access code and leave a corresponding message. The system then provides anonymous dial-in details, allowing the whistleblower to log in to this electronic mailbox at any time. Wilo will then get in touch within a few days, e.g. in the form of queries. The whistleblower can then in turn respond to these queries. This communication cycle can be repeated as often as necessary.



By phone with a phone number and a dial-in code
– *please take note of the individual phone numbers for your country in the annex*

After dialling in with the free phone number, you enter an access code as an identifier for Wilo and leave a message. You do not speak with a natural person during the call. All instructions have been recorded in advance and guide the caller seamlessly through the process. This message is transcribed and sent to Wilo. Wilo will then get in touch within a few days, e.g. in the form of queries. The whistleblower can then in turn respond to these queries by voice message. This conversation cycle can be repeated as often as necessary.

Group Internal Audit & Compliance is responsible for the Wilo whistleblower system. It is operated by a service provider in order to protect the anonymity of the whistleblower; the system is of course certified and also meets the relevant data protection requirements.

You can also contact the Wilo Group directly by postal mail:



WILO SE
Group Internal Audit & Compliance
LkSG Beschwerdeverfahren
Wilopark 1
D-44263 Dortmund

3.2 Who can submit reports?

In principle, anyone who witnesses or suspects a breach of one of the aforementioned protected legal positions or believes that there is a risk of such a breach occurring. This person does not have to be personally affected by the (possible) breach.

3.3 What should this person keep in mind when submitting a report?

Reports should be formulated in as clear and comprehensible a fashion as possible in order to be able to assess the matter in question and then prepare both potential investigations and also the final decision in the best possible manner.

To ensure prompt processing and consideration of the reported case, every report (if possible) should be formulated in such a way that the following questions can be answered:

What happened and when/where did it happen?

- Chronological overview of the matter and context

Who committed the offence?

- If known: Specification of names, position and Wilo company concerned or supplier/business partner

Who has been impacted or harmed by the offence?

- Names and number of affected persons

Are there any witnesses or evidence?

- Evidence can be enclosed in the report (also in the reporting tool) and is a key component in establishing a case – e.g. photos or e-mails

Was the incident reported elsewhere before?

- For example, to a manager or public authority

How should further communication take place?

- Unless requested otherwise, Wilo will use the digital mailbox in the whistleblower system for further communications; if initial communication takes place via postal mail, please advise on the desired method of communication going forward in the letter itself.

3.4 What happens after the reports have been submitted?

All incoming reports will be processed, regardless of whether all or only some of the aforementioned questions can be answered by the report.

Acknowledgement of receipt

The whistleblower will immediately receive an acknowledgement of receipt after submitting a report.

Check according to the LkSG

A check is performed with regard to whether the report affects a protected legal position according to the LkSG. In borderline cases, a committee consisting of Compliance, Legal and Sustainability will decide. If the case does not fall within the scope of the LKSG, the whistleblower will be informed accordingly and advised on which responsible body to contact.

Investigating the case

The report is checked for plausibility. The relevant parties also examine whether the report may give rise to an initial suspicion of an infringement of one or more of the aforementioned legal positions. If this is the case, the responsible body will launch an investigation. The investigation will be conducted according to uniform standards. In the event of queries, the matter will be discussed with the whistleblower. The length of the investigation will depend on the complexity of the matter in question. In the event of lengthy investigations, the whistleblower may receive updates.

Deciding on the next steps

If the investigating body is convinced of the facts of the case, a decision will be made based on the procedural principles outlined below. Other persons, such as managers etc., may be consulted before a decision is made. Those entrusted with the case must act impartially; they are not bound by instructions. They are also obliged to maintain confidentiality. If the aggrieved party's starting point is a dispute, the decision may also consist of an offer to settle the dispute through consensual resolution.

Initiating appropriate measures

If it is determined following an investigation that there is in fact a breach, a risk, an infringement or misconduct, Wilo will take immediate measures. These measures and the length of their implementation may differ depending on the nature and severity of the matter. Remedial measures for risks or violations concerning human rights and environmental matters are implemented with top priority and as quickly as possible.

4. Procedural principles

4.1 How are persons affected by a report protected?

Investigations are subject to the general constitutional procedural principles, as applied in criminal and administrative offence proceedings.

A presumption of innocence is afforded to persons affected by reports until an offence can be proved.

The allegation is communicated to all persons affected by a report at an appropriate point in time. The person is entitled to present a counterargument in due course before a decision is reached. If further information or evidence is revealed following investigations, the right to present a counterargument against these can also be exercised.

Persons under investigation may call in other individuals of their choosing to support them in refuting the allegations brought against them. It is incumbent upon the investigating body to clarify the facts of the case objectively and thus also to establish exculpatory facts or endeavour to find such facts – with external assistance if required.

4.2 How are whistleblowers protected?

If the whistleblower is not already acting anonymously, they are protected by the fact that the confidentiality of their identity is protected. Anyone entrusted with processing the case or anyone with access to the investigations are subject to a particular obligation to maintain confidentiality.

Investigations are conducted in close cooperation with the anonymous and non-anonymous whistleblower if there is a risk that the investigation might lead to the identity of whistleblower being revealed.

Furthermore, the principles of the Whistleblower Protection Act, the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) are applied and observed.

Whistleblowers will also be protected after the investigations / proceedings have concluded. Acts of discrimination, hostility or intimidation towards the whistleblower will not be tolerated.

Annex 1: Overview of telephone numbers and dial-in details for SpeakUP hotline

Annex 1

	Country	Phone Instruction	Access code	Language Option 1	Language Option 2	Language Option 3	Language Option 4
1	ALBANIA	00-800-0010 Wait for the tone or instructions, and then dial: 800-876-1871	69115	Albanian	English		
5	ARGENTINA	08006660078	98355	Latin American Spanish	US English		
7	AUSTRALIA	1800452051	32413	English			
8	AUSTRIA	0800-295175	82196	German	English		
10	BELARUS	882000730010	45860	Russian	English		
11	BELGIUM	0800-71365	78965	Flemish	French	English	
12	BOSNIA AND HERZEGOVINA	080082872	25589	Bosnian	Serbian	Croatian	English
13	BRAZIL	08008919678	11147	Brazilian Portuguese	US English		
14	BULGARIA	008001194474	90905	Bulgarian	English		
16	CAMEROON	+237 697 777 885	86905	French	English		
17	CANADA	1-866-8181239	31739	US English	French Canadian		
18	CHILE	12300202775	74285	Latin American Spanish	US English		
19	CHINA	4009901434 If you are calling with provider Unicom: 108007440179 If you are calling with provider Telecom (landline only): 108004400179	99270	Mandarin Simplified	Cantonese Simplified	English	
21	COSTA RICA	08000440029	66909	Latin American Spanish	US English		
23	CROATIA	0800223069	24292	Croatian	English		
25	CZECH REPUBLIC	800 900 538	90967	Czech	English		
26	DENMARK	80885638	27126	Danish	English		
27	EGYPT	0800-0000615	07887	Arabic	English		
28	ESTONIA	800 0044 208	47903	Estonian	English		
30	FINLAND	08001-13031	41179	Finnish	English	Swedish	
31	FRANCE	0800-908810	01314	French	English		
32	GEORGIA	0706777347	58281	Georgian	English		
33	GERMANY	0800-1801733	94078	German	English		
34	GHANA	0-2424-26-004 Wait for the tone or instructions, and then dial: 888-799-0983	34261	English			
35	GREECE	0080044142695	06204	Greek	English		

36	HUNGARY	0680981359	77166	Hungarian	English		
37	INDIA	0008004401221	24968	English	Hindi		
38	INDONESIA	If you are calling with provider Indosat: 001 803 440 559 If you are calling with provider Telkom: 007 803 440 559	17906	Indonesian	English		
39	IRAN	+98 21 9100 9845	61292	Persian	English		
41	IRELAND	1800-552136	31571	English			
42	ISRAEL	1809444260	08613	Hebrew	Arabic	English	
43	ITALY	800-787639	06114	Italian	English		
44	JORDAN	080022868	41783	Arabic	English		
45	KAZAKHSTAN	88003332641	26346	Kazakh	Russian	English	
46	KENYA	0800733255	68359	English	Swahili		
47	KOREA (SOUTH)	007984424261	89558	Korean	English		
49	LATVIA	8000 2490	70543	Latvian	English		
50	LEBANON	01426801 Wait for the tone or instructions, and then dial: 800-876-1871	25005	Arabic	French	English	
53	LIECHTENSTEIN	0800-561422	86535	German	French	Italian	English
54	LITHUANIA	880090006	17204	Lithuanian	English		
55	LUXEMBOURG	800-21048	98381	French	German	English	
56	MALAYSIA	1-800-88-4307	50364	Malay	English		
57	MALTA	80062460	95590	English			
58	MEXICO	8001234618	98261	Latin American Spanish	US English		
59	MOLDOVA	0-800-61433	02037	Romanian	English		
61	MOROCCO	0800-092359	55080	Arabic	French	English	
63	NETHERLANDS	0800 0222931	15355	Dutch	English		
64	NIGERIA	07080601488	18921	English			
65	NORTH MACEDONIA	0800-94288 Wait for the tone or instructions, and then dial: 800-876-1871	86583	Macedonian	English		
66	NORWAY	800-18333	73239	Norwegian	English		
67	PAKISTAN	0080090044214	90386	Punjabi	English	Urdu	
68	PERU	080052767	45554	Latin American Spanish	US English		
69	PHILIPPINES	1800 1441 0215	71624	Filipino	English		
70	POLAND	008004411739	40308	Polish	English		
71	PORTUGAL	800-831528	21950	Portuguese	English		
72	QATAR	8000162	60690	Arabic	English		
73	ROMANIA	0800894540	25404	Romanian	English		

74	RUSSIA	810 800 2626 9902	02427	Russian	English		
75	SAUDI ARABIA	8008442726	89922	Arabic	English		
76	SENEGAL	800-103-072 Wait for the tone or instructions, and then dial: 866-243-4430	32696	French	English		
77	SERBIA	0800190078	56118	Serbian	English		
78	SINGAPORE	1800-8232206	77927	English	Malay	Mandarin Traditional	
79	SLOVAKIA	0800004529	61054	Slovak	English		
80	SLOVENIA	080080806	92768	Slovene	English		
81	SOUTH AFRICA	0800991526	85706	English			
82	SPAIN	900-973174	69329	Spanish	English		
84	SWEDEN	020-798813	20017	Swedish	English		
85	SWITZERLAND	0800-561422	95396	Swiss German	French	Italian	English
87	TAIWAN, GREATER CHINA	00801444317	64533	Mandarin Traditional	English		
90	THAILAND	001800 441 4284	79461	Thai	English		
91	TUNISIA	+31 205043246 (paid number)	26631	Arabic	French	English	
92	TÜRKİYE	00800 448824369	98078	Turkish	English		
94	UKRAINE	0800 801 192	53818	Ukrainian	Russian	English	
95	UNITED ARAB EMIRATES	80004412727	07259	Arabic	English		
96	UNITED KINGDOM	0800-1693502	32866	English			
97	UNITED STATES	1-866-2506706	16095	US English	Latin American Spanish		
98	URUGUAY	0004044014	27704	Latin American Spanish	US English		
99	UZBEKISTAN	008001201253	64105	Uzbek	Russian	English	
##	VIETNAM	Viettel: 12280319 VPNT/Vinaphone: 120852140 Mobifone: 121020030	68619	Vietnamese	English		