

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

Organization Code:
For Wilo employees: 124654
For externals: 124665

Country	Phone Instruction	Language Option 1	Language Option 2	Language Option 3	Language Option 4
ALBANIA	Number: +355 4 530 1801 *	Albanian	English		
ALGERIA	Number: +213 983 29 93 38 *	English			
ANGOLA	Number: +244 226 425 610 *	English			
ANGUILLA	Freephone: 1833 422 2005	English			
ANTIGUA & BARBUDA	Freephone: 1833 422 2006	English			
ARGENTINA	Number: +54 11 2039 7280 *	Latin American Spanish	US English		
AUSTRALIA	Number: +61 2 8284 6262 *	English			
AUSTRIA	Freephone: 0800 909 683	German	English		
BAHAMAS	Freephone: 1833 422 2007	English			
BAHRAIN	Number: +973 1650 1936	English			
BANGLADESH	Freephone: +880 (0) 9610 998462	English			
BARBADOS	Number: +1 (246) 623 9631 *	English			
BELARUS	Freephone: 8 820 0491 0089	Russian	English		
BELGIUM	Freephone: 0800 89 326	Flemish	French	English	
BELIZE	Freephone: 1800 0130 076	English			
BENIN	Number: +229 20 90 0380 *	English			
BERMUDA	Freephone: 1833 422 2008	English			
BHUTAN	Freephone: +975 2 379 003	English			
BOLIVIA	Freephone: 800 105 122	English			
BOSNIA AND HERZEGOVINA	Number: +387 70 330 093 *	Bosnian	Serbian	Croatian	English
BOTSWANA	Freephone: 800 786 1103	English			
BRAZIL	Number: +55 (11) 4700 8838 *	Brazilian Portuguese	US English		
BRUNEI DARUSSALAM	Freephone: 801 4657	English			
BULGARIA	Freephone: 800 210 0645	Bulgarian	English		
BURKINA FASO	Number: +226 25 30 09 82 *	English			
CAMBODIA	Freephone: 1800 209 867	English			
CAMEROON	Freephone: +237 6 57 10 31 12	French	English		
CANADA	Number: +1 (514) 395 0496 *	US English	French Canadian		
CAYMAN ISLANDS	Number: +1 (345) 769 5580 *	English			
CHILE	Number: +56 22 483 5917 *	Latin American Spanish	US English		
CHINA	Country wide number with no supplier restriction: 400 120 1842 *	Mandarin Simplified	Cantonese Simplified	English	

COLOMBIA	Number: +57 601 242 1247 *	English			
COSTA RICA	Number: +506 4036 0350 *	Latin American Spanish	US English		
Côte d'Ivoire	Freephone: +225 05 66 77 0918	English			
CROATIA	Freephone: 0800 7745	Croatian	English		
CYPRUS	Freephone: 800 91142	English			
CZECHIA	Freephone: 800 050 833	Czech	English		
DENMARK	Number: +45 43 31 09 61 *	Danish	English		
DOMINICA	Freephone: 1833 422 1998	English			
DOMINICAN REPUBLIC	Number: +1 (829) 947 1996 *	English			
ECUADOR	Freephone: 1800 001 432	English			
EGYPT	Freephone: 0800 000 0083	Arabic	English		
EL SALVADOR	Number: +503 2230 4752 *	English			
ESTONIA	Number: +372 609 3008 *	Estonian	English		
ETHIOPIA	Freephone: 800 86 1919	English			
FIJI	Freephone: 008 002 650	English			
FINLAND	Freephone: 0800 392 912	Finnish	English	Swedish	
FRANCE	Freephone: 080 554 3753	French	English		
FRENCH GUIANA	Freephone: 0800 99 1448	English			
FRENCH POLYNESIA	Freephone: 0800 91 4886	English			
GEORGIA	Freephone: 1800 008 013	Georgian	English		
GERMANY	Freephone: 0800 1818 952	German	English		
GHANA	Number: +233 59 699 3553 *	English			
GREECE	Freephone: 0080 0441 45924 Can only be connected by Cosmote mobile and OTE landline	Greek	English		
GRENADA	Number: +1 (473) 230 0333 *	English			
GUAM	Freephone: 1833 809 6777	English			
GUATEMALA	Number: +502 2302 8459 *	English			
HONDURAS	Freephone: 800 2791 6139	English			
HONG KONG	Number: +852 3019 4193 *	English			
HUNGARY	Freephone: 06 809 845 89	Hungarian	English		
ICELAND	Number: +354 415 0349 *	English			
INDIA	Freephone: 0008 0005 03159	English	Hindi		
INDONESIA	Number: +62 21 8063 0074 *	Indonesian	English		
IRELAND	Freephone: 1800 800 636	English			
ISRAEL	Number: +972 3374 1225 *	Hebrew	Arabic	English	
ITALY	Freephone: 800 147 694	Italian	English		
JAMAICA	Number: +1 (876) 677 9125 *	English			
JAPAN	Number: +81 3 6627 0734 *	English			
JORDAN	Freephone: 0800 23801 No mobile access	Arabic	English		

KAZAKHSTAN	Number: (+7) 877 2735 74582 * No mobile access	Kazakh	Russian	English	
KENYA	Number: +254 20 765 0957 *	English	Swahili		
KOREA (SOUTH)	Number: +82 2 3700 5146 *	Korean	English		
KUWAIT	Freephone: +965 2205 5730	English			
LATVIA	Freephone: 800 05929	Latvian	English		
LEBANON	Freephone: first dial 01-426-801 and then 833 816 0913	Arabic	French	English	
LITHUANIA	Freephone: 8800 30366	Lithuanian	English		
LUXEMBOURG	Number: +352 342 080 8982 *	French	German	English	
MALAYSIA	Number: +60 3 7724 3136 *	Malay	English		
MALTA	Freephone: 8006 5144	English			
MARTINIQUE	Freephone: 0800 90 1651	English			
MAURITIUS	Number: +230 5 297 0999 *	English			
MEXICO	Number: +52 55 4780 6198 *	Latin American Spanish	US English		
MOLDOVA	Freephone: 080 060 016	Romanian	English		
MOROCCO	Number: +212 5 30 14 41 08 *	Arabic	French	English	
MYANMAR	Freephone: 0800 800 8062	English			
NAMIBIA	Freephone: +264 83 380 0103	English			
NEPAL	Freephone: 1800 001 0186	English			
NETHERLANDS	Number: +31 10 700 75 03 *	Dutch	English		
NEW ZEALAND	Number: +64 9 913 5892 *	English			
NICARAGUA	Number: +505 7513 7610 *	English			
NIGERIA	Freephone: 070 8060 1221	English			
NORTH MACEDONIA	Number: +389 2551 3216 *	Macedonian	English		
NORWAY	Number: +47 24 14 06 01 *	Norwegian	English		
OMAN	Freephone: 8007 4161	English			
PAKISTAN	Freephone: 0080 0900 44437	Punjabi	English	Urdu	
PANAMA	Number: +507 308 4480 *	English			
PAPUA NEW GUINEA	Freephone: 0008 61322	English			
PARAGUAY	Freephone: 0098 0044 10266 No mobile access	English			
PERU	Freephone: 0800 74535	Latin American Spanish	US English		
PHILIPPINES	Freephone: 1800 8394 8474 Can only be connected by Globe Telecom device	Filipino	English		
POLAND	Freephone: 800012953	Polish	English		
PORTUGAL	Freephone: 800 831 302	Portuguese	English		
PUERTO RICO	Number: +1 (787) 200 7305 *	English			
QATAR	Freephone: 00800 101 094	Arabic	English		
REUNION	Freephone: 1800 916 980	English			
ROMANIA	Freephone: 0800 400 653	Romanian	English		
RUSSIAN FEDERATION	Freephone: 8 (800) 100 69 94	Russian	English		

SAUDI ARABIA	Freephone: 800 850 1433	Arabic	English		
SERBIA	Number: +381 10 520 043 *	English			
SEYCHELLES	Freephone: 800 131	English			
SINGAPORE	Number: +65 6403 7051 *	English	Malay	Mandarin Traditional	
SLOVAKIA	Freephone: 0800 113 418	Slovak	English		
SLOVENIA	Freephone: 0800 83115	Slovene	English		
SOUTH AFRICA	Number: +27 (21) 427 7937 *	English			
SPAIN	Number: +34 900 031 156 *	Spanish	English		
SRI LANKA	Number: +94 (72) 091 0370 *	English			
SUDAN	Freephone: +249 15 655 9883	English			
SURINAME	Freephone: 833 816 0919	English			
SWEDEN	Freephone: 020 160 4703	Swedish	English		
SWITZERLAND	Freephone: 080 000 5691	Swiss German	French	Italian	English
TAIWAN, PROVINCE OF CHINA	Number: +886 2 7743 8912 *	Mandarin Traditional	English		
TANZANIA, THE UNITED REPUBLIC OF	Freephone: 0800 11 1020	English			
THAILAND	Number: +66 2 844 9693 *	Thai	English		
TRINIDAD & TOBAGO	Number: +1 (868) 224 1869 *	English			
TUNISIA	Number: +216 31 300 338 *	Arabic	French	English	
TÜRKIYE	Freephone: 0080 04488 28602	Turkish	English		
TURKS AND CAICOS ISLANDS	Freephone: 1833 462 1355	English			
UGANDA	Number: +256 41 423 8162 *	English			
UKRAINE	Freephone: 0800 801 205	Ukrainian	Russian	English	
UNITED ARAB EMIRATES	Freephone: 800 0444 0408	Arabic	English		
UNITED KINGDOM	Freephone: 080 0022 4118	English			
UNITED STATES	Number: +1 (669) 288 7154 *	US English	Latin American Spanish		
URUGUAY	Freephone: 0004 1598 5762	Latin American Spanish	US English		
VENEZUELA, BOLIVARIAN REPUBLIC OF	Number: +58 212 335 7722 *	English			
VIETNAM	Number: +84 1900 3271 *	Vietnamese	English		
VIRGIN ISLAND (BRITISH)	Freephone: 1833 462 1356	English			
VIRGIN ISLANDS (U.S.)	Freephone: 1833 724 6398	English			
ZIMBABWE	Freephone: +263 867 742 2010	English			

* Call charged at local rate