



GUIDE TO COMPLAINT MANAGEMENT

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1. Purpose

These guidelines describe the complaints management process for the KSM Castings Group. The introduction and maintenance of this process should provide the opportunity to report problems, grievances and rule violations.

Any misconduct or violations of laws, guidelines or principles must be reported in order to prevent possible damage to the KSM Castings Group and its employees. All employees have been informed of their personal responsibility to act lawfully by being issued with our Code of Conduct.

External parties are made aware of the possibility of submitting complaints on our homepage, in official letters and in e-mail signatures. In addition, the Supplier Code of Conduct, which is also available on the homepage and forms part of the terms and conditions of purchase, applies to all suppliers of the Group.

2. Responsibilities

All parties involved within the KSM Castings Group are necessary for sustainably effective complaints management.

Party	Responsibilities
Management	Responsibility for countermeasures, clarification and transparency
Head of HR Europe	Confidential contact person, compliance responsibility, responsibility for countermeasures
Human Rights Officer	Confidential contact person
CSR-Manager	Confidential contact person
General Works Council Chairman	Confidential contact person
Personnel management and the Works council chairmen of the locations	Confidential contact person
Employees	Behaving with integrity, acting lawfully, reporting violations

The human rights officer is independent in his/her role for the implementation of human rights due diligence obligations and is not bound by instructions. Reports received via the complaints procedure are treated confidentially, evaluated, further analyzed and (if necessary) remedial measures are established by her/him and other responsible persons of the KSM Castings Group.

3. Description

3.1 Complaints offices

Personnel department / works council:

Both the employees in the HR departments and the works councils are available to employees at all locations at any time to take up a complaint. The reports, whether in writing or in person, are always treated confidentially and, if desired, anonymized for the further initiation of measures.

Complaints box:

There is a locked complaints box in all plants where written complaints, suggestions for improvement or similar messages can be posted. These can be submitted anonymously or not. The complaints box is regularly opened jointly by HR management and the chairperson of the works council at the locations.

E-mail / Phone:

Under the central e-mail address compliance@ksmcastings.com and telephone number +49 5121 505-1888 (anonymized) reports can also be submitted by external parties.

3.2 Processing deadlines

The whistleblower will receive confirmation of receipt of the report within seven days for all impersonal reporting channels, if known. The whistleblower will be informed of the measures taken no later than three months after the report has been submitted.

3.3 Information for the parties involved

Depending on the category of violation, the various parties involved must be informed. In each internal case, the respective HR managers and works council chairmen of the locations and Head of HR Europe are informed. The Human Rights Officer is also informed of any indications of human rights or environmental risks or violations.

3.4 Procedure

The following staggered procedure applies according to the assessment of the violation:

1. Receipt of the complaint or notification. Receipt is confirmed and documented to the person providing the information.
2. Examination of the complaint or notification. The information is examined and the further procedure and responsibilities are determined. In the event of a rejection, the person providing the information will receive a justification.
3. Clarification of the facts. The facts of the case are discussed and examined with the involvement of the whistleblower.
4. Working out a solution with the persons providing the information. From step 3, a proposal for remedial action is drawn up together with the whistleblower – if known. If necessary, agreements on compensation are made.
5. Remedial measures. The agreed remedial measures are implemented and followed up.
6. Review and conclusion. The result achieved is evaluated and communicated to the whistleblower.
7. Effectiveness test. The effectiveness of the complaints procedure is reviewed annually and on an ad hoc basis. Adjustments are made as required.

During the procedure, there is transparent communication with the whistleblower about the process and progress.

3.5 Exception

In the event of deliberate action against the company's instructions or against a law that could cause damage to the company or jeopardize the integrity of employees (e.g. violation of the GDPR), the employment relationship or the business relationship may be terminated immediately. An assessment of such a violation must be made with all parties mentioned under point 2.

3.6 Supply Chain Due Diligence Act

Confidentiality of identity and protection against discrimination are ensured by the responsible persons named in section 2.

The number, content and results of complaints in accordance with the Supply Chain Due Diligence Act (LkSG) are documented and publicly reported. Both the complaints received and the implementation and effectiveness of preventive and corrective measures are recorded.

The effectiveness of the complaints procedure is measured using the following key figures:

- Number of complaints (total number / differentiated by topic)
- Information on the whistleblower (assignment to target group, e.g. own employees, employees of direct/indirect suppliers, etc.)
- Percentage of complaints resolved (out of the total number of complaints and differentiated by complaint resolution, e.g. justified rejection, withdrawal of complaint, remedy/no remedy, amicable settlement)
- Average time taken to resolve a complaint
- Satisfaction of those who have submitted a complaint with the outcome of the procedure

Complaints about human rights and environmental risks and violations are included in the regular risk analysis in accordance with the Supply Chain Due Diligence Act.