

January 2024

Rules of procedure for the complaints procedure in accordance with the Supply Chain Due Diligence Act (LkSG)

Welton Bibby & Baron Ltd is aware of its social and ecological responsibility and has set out its guiding principles in a declaration of principles. We want to meet these requirements not only in our own company, but also along our supply chain. It is important to us that basic environmental and human rights standards are adhered to.

Accordingly, we have set up an effective complaints procedure that can be used to report information on human rights and environmental risks or violations can be reported. Standardized processes and the confidential and professional handling of reports by internal experts form the foundation of this system.

The most important information on the complaints procedure is presented below in an understandable, comprehensible and in the interests of maximum transparency.

1. scope of application of the complaints procedure

The complaints procedure can be used to report all indications of possible violations of laws and/or regulations, including human rights or environmental risks or violations relating to the company's own business area and along the entire supply chain. The complaints procedure in accordance with the LkSG therefore enables external and internal company persons to point out human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of the economic activities of the companies in the LkSG.

2. complaints channel

The business partner and its employees and other rights holders are encouraged to report any complaints on human rights and environmental risks or violations to our complaints office via e-mail humanrights@welton.co.uk.

Organizational measures ensure that the confidentiality of information received via these channels is maintained.

3. procedure after receipt of the complaint

- When a tip/complaint is received, its receipt is documented internally and the person making the tip receives a confirmation of receipt.
- The tip-off or complaint is checked for the scope of application of the LkSG once it has been recorded.
- The Complaints Office then investigates the matter comprehensively itself or forwards it to the responsible body, e.g. within the company, for investigation, while respecting the principle of confidentiality and data protection. If necessary and if possible, the complaints office or the responsible office discusses the facts of the case with the whistleblower and asks for further information if necessary.
If, after clarification of the facts, discussion and investigation, the complaints office or the responsible body is convinced that there are no human rights or environmental risks or violations of human rights or environmental obligations in its own business area or with suppliers, the case will be closed.

If, in the opinion of the complaints office or the responsible body, the investigation confirms human rights and environmental risks or violations of human rights or environmental obligations in its own business area and with suppliers, a proposal for further action (in particular preventive and remedial measures) is drawn up. Where possible and appropriate, the whistleblower will be involved in this process.

The implementation of the proposed solution is then followed up by the complaints office or the responsible office.

- The whistleblower will be informed of the conclusion of the complaints procedure, if there is an opportunity to make contact.

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- The processing time depends on the case and can therefore take from a few days to several months. However, we endeavor to complete the investigation in a timely manner.
- Selected employees are entrusted with the implementation of the complaints procedure. They are independent with regard to the complaints procedure, are not bound by instructions and are obliged to maintain confidentiality.
Technical measures ensure that only they have access to the information transmitted via our website or by e-mail; the same applies to communication by post.
- We guarantee your protection. The protection of notifiers against discrimination or punishment on the basis of complaints or information provided is an important part of our complaints procedure. Notifiers or complainants disclose their identity in the contact form or at the beginning of the communication. The confidentiality of the identity is maintained during the complaints procedure and also after its conclusion. Your personal information will only be passed on if you have given your prior consent or if external authorities that may need to be involved have a legal right to do so.
- In accordance with legal requirements, internal company documentation is stored for seven years and then destroyed.
A report on the past financial year must be submitted annually, with appropriate protection of business and trade secrets, and published no later than four months after the end of the financial year and kept publicly accessible for at least seven years.