

# Rules of procedure for the reporting mechanism in accordance with Section 8 of the Supply Chain Due Diligence Act (LkSG) and the Whistleblower Protection Act (HinSchG)

## Preface

These rules of procedure serve to ensure compliance with the requirements of the LkSG and the HinSchG.

They describe the main features of the complaints procedure, access to the procedure and its application as well as responsibilities, while also providing a transparent outline of how grievances are addressed and processed. This includes all reports of potential compliance violations as well as information on human rights and environmental risks or violations within the supply chain that have occurred as a result of OGE activities in its own area of business or in relation to a supplier.

## Responsibilities

Responsibility for the implementation of and compliance with these rules of procedure lies with OGE's Compliance Office, which is responsible for receiving and processing reports and coordinating the necessary activities. The Compliance Office will involve the Human Rights Officer when dealing with reports relating to supply chain due diligence.

## Submitting information

Any person, both internal and external, can submit reports via various channels listed on the OGE website and intranet, including:

- [Digital reporting channel](#) (German and English)
- [E-mail](mailto:oge-compliance@oge.net) OGE Compliance <oge-compliance@oge.net>
- By post (Compliance Office, Kallenbergstr. 5, 45141 Essen / Germany)
- 24/7 telephone hotline on +49 (0)201/3642-14555 (this may be an answering machine recording the message)
- Personal report to the Compliance Office

All reports are processed without delay and in the same way, regardless of the channel through which they are received.

The procedure is free of charge for the whistleblower.

## Confidentiality and protection of whistleblowers

All information received will be treated in confidence, and the identity of the whistleblower will always be protected. If desired, reports can also be made completely anonymously.

In accordance with the provisions of the German Whistleblower Protection Act (HinSchG), all information including personal data and other information that allows conclusions to be drawn about the identity of the whistleblower is protected.

No reprisals will be taken against persons submitting reports in good faith.

Raising suspicions about another person can lead to serious consequences for that individual, so the whistleblower system must always be used responsibly.

## Feedback to the whistleblower

The Compliance Office will send a confirmation of receipt to the whistleblower within seven (7) working days, provided the whistleblower can be contacted, including via the anonymous, secure mailbox of the digital reporting channel. Once the procedure has been completed, the whistleblower will again be informed accordingly.

If the whistleblower so wishes, the facts of the case can be discussed with the whistleblower. This can help to clarify and assess the information provided as comprehensively as possible. The exchange with the whistleblower is intended to ensure that all relevant aspects are taken into consideration and that any

misunderstandings or ambiguities are addressed and resolved. Participation in this dialogue is voluntary on the part of the whistleblower and can also be refused entirely.

### **Processing of reports**

Once a report has been received, the Compliance Office will conduct an initial review to assess its relevance, plausibility and urgency. The personnel dealing with the report in the Compliance Office are appropriately trained, impartial, independent and sworn to secrecy.

If necessary, a detailed investigation will then be initiated. This investigation can be conducted by internal or external specialists, such as internal auditors, lawyers, external auditors or forensic experts. External specialists that we involve are also bound by contractual or statutory confidentiality obligations to maintain the confidentiality of the information you disclose to us.

If the investigations reveal any violations of laws or regulations, or if breaches of human rights or environmental obligations are identified in the process, appropriate measures will be taken to eliminate the risks or violations identified.

### **Documentation and follow-up**

All steps of the process will be documented, including the information received, the investigations carried out and the measures taken. The Compliance Office generates regular reports on the information received and the measures taken for presentation to the management. If necessary, reports as part of the LkSG are submitted to the Federal Office of Economics and Export Control (BAFA).

### **Review and updates**

These rules of procedure are regularly reviewed and updated as necessary to ensure compliance with legal requirements and internal policies.

Open Grid Europe GmbH

Compliance Officer

Human Rights Officer