

**Rules of procedure for the complaints procedure
of the Pilkington Holding GmbH Group
in accordance with § 8 of the Supply Chain Due Diligence Act (LkSG)**

The NSG Group has a long tradition as a responsible company and is committed to its social responsibility. Compliance with standards and legal regulations is therefore a top priority for us. Violations of these must be recognised at an early stage, particularly in order to initiate appropriate countermeasures and avert potential damage to customers, employees, business partners and the company itself. The NSG Group also assumes responsibility for respecting and strengthening internationally recognised human rights within its own business areas and through appropriate management of its supply chains. The NSG Group implements all requirements of the German Supply Chain Due Diligence Act (LkSG) for the fulfilment of human rights and environmental due diligence obligations and complies with their implementation. A key element of these due diligence obligations is the establishment of an effective complaints procedure that can be used to report human rights and environmental risks or violations.

The NSG Group has set up several reporting channels in order to follow up information on violations within or by the company in a timely, fair and appropriate manner. Employees of the NSG Group as well as external third parties can use these channels to report possible violations of legal provisions or internal regulations.

The purpose of these Rules of Procedure is to provide a transparent presentation of the complaints procedure embedded in the NSG Group's reporting system within the meaning of Section 8 (2) LkSG for all German companies in the Group, namely **Pilkington Holding GmbH, Pilkington Deutschland AG, Pilkington Automotive Deutschland GmbH, Bauglasindustrie GmbH, Pilkington Glasveredelung GmbH** and **Dahlbusch Aktiengesellschaft** (hereinafter collectively referred to as "NSG"). It provides information on the main features of the complaints procedure, access to the procedure and its availability, and responsibilities. Furthermore, it also provides information on what happens with incoming information and complaints, i.e. how the complaints procedure is carried out. It is important to NSG to present this information in an understandable and comprehensible manner and to create the greatest possible transparency about the process.

What is the purpose of the complaints procedure?

On the one hand, the complaints procedure serves as an early warning system through which problems are recognised and, in the best case, resolved. Before people or the environment are actually harmed. It is intended to give everyone the opportunity to submit relevant complaints or reports to NSG and thus draw attention to human rights and environmental risks.

On the other hand, the complaints procedure provides access to appropriate remedies for imminent or existing violations of legal interests if these grievances are brought to the attention of the complainant via the complaints procedure. This gives people the opportunity to report suspected violations of the law so that damage can be averted or minimised immediately.

Who is the complaints procedure aimed at? Who cannot lodge a complaint?

All employees of the NSG Group, direct and indirect suppliers as well as their employees and also third parties, even if they are not directly affected by risks or violations, can use the complaints procedure, regardless of whether this happens in Germany or abroad.

There are no costs associated with using the complaints system.

What types of reports or complaints can be submitted?

The complaints procedure enables individuals 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 NSG Group's business activities in its own business area or in the supply chain. The subject of the procedure can therefore be all complaints and reports that refer to potential human rights risks and violations, which may be the subject of the complaint/report and may relate in particular to the following aspects:

- Child labour
- Forced labour and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association, freedom of unionisation and the right to collective bargaining
- Unequal treatment in employment
- Withholding an appropriate wage
- Destruction of natural resources through environmental pollution
- Unlawful violation of land rights
- Hiring or using private/public security forces that may cause harm due to lack of training or control
- Acts or omissions in breach of duty that are directly capable of impairing a protected legal position (= other human rights) in a particularly serious manner and whose unlawfulness is obvious when all relevant circumstances are reasonably assessed

Potential, reportable environmental risks and violations can take the following forms in particular:

- Violation of a ban resulting from the Minamata Convention, which aims to protect human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds into the air, water and soil.
- Violation of the ban on the production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs.
- Violation of the ban on the import and export of hazardous waste within the meaning of the Basel Convention.

How can I submit complaints or comments?

Complaints and reports can be submitted at any time in two different ways. All complaints and notifications, regardless of the way in which they are received by the NSG Group, are processed immediately and in the same way.

The whistleblower system offers various places to report potential breaches of regulations and laws (compliance violations):

- Complaints and information can be submitted **by telephone** via the Ethics & Compliance Hotline on the toll-free number

0800 / 181-2396

- **Online:** NSG also provides a web form for the Ethics & Compliance Hotline, which can be used to enter complaints and information. It can be used in various languages. The web form can be accessed at <http://reportinglineeu.nsg.com> or using the following QR code



Both channels ensure that the messages are handled confidentially.

Who processes the complaints and reports?

Complaints or information are processed by selected and specially trained employees of the NSG Group and/or the companies concerned.

All persons responsible for processing have the following characteristics:

- impartial
- independent
- not bound by instructions
- bound to secrecy
- appropriately trained
- equipped with sufficient time resources

How does the complaints procedure work?

After a complaint or a tip-off has been received, the whistleblower will receive a confirmation of receipt within one week at the latest.

The NSG Group or the companies concerned will remain in contact with the whistleblower throughout the entire procedure, provided this is desired and a contact option is available.

The complaints or reports are initially examined centrally to determine whether the reported issue constitutes a human rights or environmental risk or a violation of human rights or environmental obligations. This also involves checking which company or supplier is affected by the report. The complaint or report is then passed on to the responsible office, for example within a company.

The next step is to clarify the facts of the case, which generally takes place within three months. If, in the course of clarifying the facts, it is established that a violation of human rights and/or environmental obligations is imminent or is already taking place, remedial measures are initiated immediately.

The persons involved in the complaints procedure follow up on whether and to what extent the remedial measures are implemented.

In addition, a proposal for further action is drawn up based on the findings of the investigation.

The result is finally evaluated with the whistleblower and the procedure is thus concluded.

How are whistleblowers protected against discrimination and reprisals on the basis of a complaint or report?

The protection of whistleblowers from being penalised or discriminated against on the basis of complaints or information provided is an important part of our complaints procedure.

The following measures serve to protect whistleblowers:

- All complaints and reports are only processed by a small group of selected and specially trained persons.
- All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, is treated confidentially. This also applies after the procedure has been completed.
- In accordance with legal requirements, internal company documentation is stored for 7 years and then destroyed.

The NSG Group protects whistleblowers from being penalised or discriminated against because of a complaint or a whistleblowing incident.

Review and improvement

NSG will carry out regular and ad hoc reviews and continuous improvements to the complaints procedure. The findings and identified potential for improvement from the information received to date and the respective procedures as well as from the risk analyses will be taken into account. The Bafa's guidelines on the complaints procedure will be taken into account.

These rules of procedure will initially be issued in German and English. Other languages may follow once the risk analysis has identified further relevant target groups.

These rules of procedure will enter into force on 1 January 2024. They will be published on the NSG Group website at <https://www.pilkington.com/de-de/de/uber-uns/sustainability>.
