

COMPLAINTS PROCEDURE OF THE EBERSPÄCHER GROUP

RULES OF PROCEDURE FOR WHISTLEBLOWERS

I. Introduction

According to Section 3 (1) No. 7 LkSG, Eberspächer is obliged to implement an appropriate internal company complaints procedure in accordance with Sections 8 and 9 (1) LkSG. In these rules of procedure, we define the process for the submission and handling of complaints.

II. Who can report violations?

Our complaints procedure is open to everyone, in particular all employees of Eberspächer and its direct suppliers, but also affected parties or other third parties.

III. What can be reported?

Indications of human rights and environmental risks as well as violations of human rights and environmental obligations arising from Eberspächer's business activities in its own business area or those of a direct or indirect supplier in the supply chain can be reported.

IV. Where can I submit tips?

The notification can be submitted free of charge and around the clock via the Eberspächer Speak Up notification system. Several languages are available. The whistleblower system can be accessed via the Eberspächer homepage (Company - Responsibility and Sustainability - Compliance) or directly via the following link <https://eu.deloitte-halo.com/whistleblower/website/Eberspacher>.

The information provided is treated confidentially. To ensure this confidentiality, the data is hosted in certified data centers in the EU. The protection of personal data is guaranteed. In addition, extensive security measures such as 2factor authentication are implemented.

When submitting a report via Eberspächer Speak Up, the whistleblower has the option of choosing the level of security for their identity details: They can choose between "confidential but not anonymous" (personal data is disclosed in the report) or "confidential (restricted)" (data is only disclosed to the operator of the system, but not to Eberspächer) or "anonymous" (identity is not disclosed at any stage of the process).

In addition, it is also possible to send a notification by post to Eberspächer Gruppe GmbH & Co KG, Group Compliance, Fritz Müller Straße 107, 73760 Esslingen am Neckar or by e-mail to: compliance@eberspaecher.com.

It is also possible to personally inform managers, Local Compliance Officers (LCO), Division Compliance Officers (DCO) or the Chief Compliance Officer (CCO), especially for our employees.

V. How are tips dealt with?

Upon receipt of the report, the whistleblower will receive a confirmation of receipt within seven working days.

As soon as the report is received, it is forwarded to the Chief Compliance Officer or his deputy. If it is assigned to a business division, the Division Compliance Officer of the division concerned is also involved. Important cases are discussed in the Compliance Committee.

The system checks whether the report contains sufficient information for an investigation. If this is not the case, the whistleblower is asked for further information via the selected contact channel. If it is not possible to make contact, if there is no response or if sufficient information is still not provided, the case is closed.

If there are sufficient grounds for investigation, the matter is investigated in strict confidentiality and, if necessary, a specialist department of the company is involved. Attention is paid to avoiding conflicts of interest. In the course of the investigation, the facts of the case are discussed with the whistleblower as far as possible. If necessary, the whistleblower may also be asked for further information. The whistleblower will be informed of the outcome of the investigation.

If the investigation reveals sufficient evidence of a human rights or environmental risk or of a violation in this regard, a solution to remedy the situation is developed by the responsible specialist department. Where possible, the whistleblower is involved in finding a solution. Depending on the situation, the whistleblower may be offered an amicable settlement procedure.

The implementation and effectiveness of the corrective measures are tracked by the responsible persons.

VI. How are whistleblowers protected?

Any discrimination, punishment, hostility or retaliation against whistleblowers will not be tolerated by Eberspächer.

If the whistleblower experiences intimidation or reprisals as a result of their report, please contact the Eberspächer Speak Up immediately or contact Eberspächer in any other way.