

Procedural Rules for the Complaints Procedure according to the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG)

For MD ELEKTRONIK (hereinafter “MD”), the fulfillment of due diligence obligations related to human rights and the environment is of utmost importance. Violations of these obligations can have serious consequences and must therefore be identified at an early stage, so that counteracting measures can be taken to avert potential damage to the MD Group, our employees, our business partners and other affected parties.

A key element for identifying potential violations of these due diligence obligations is to maintain an effective complaints procedure which can be used to submit information about risks or infringements regarding human rights and the environment.

These procedural rules provide clear and comprehensible information with the aim of ensuring the greatest possible transparency about the main characteristics of our complaints procedure, its availability or how to access it, and the process and responsibilities involved.

1 Range of application of the complaints procedure

All indications of possible violations of any laws, regulations and/or compliance policies can be reported through the complaints procedure, including

- human rights risks
- environment-related risks
- violations of human rights-related obligations due to the company’s business activities in its own business area or that of a direct supplier
- violations of environment-related obligations due to the company’s business activities in its own business area or that of a direct supplier

2 Complaints channels

All employees and external persons in Germany and abroad can submit information through the following channels:

- Submitting information in person

In general, information can be submitted in person to any employee of the Legal & Risk department. For this purpose, please make an appointment for a private conversation, phone call or an MS Teams meeting.

- Submitting information by e-mail

Information can be submitted at any time by e-mail to incident@md-elektronik.de, preferably in German or English. Both private e-mail addresses and anonymized disposable addresses can be used to submit information.

- Submitting information by mail

Information can be sent by mail, anonymously if required, in an envelope marked as “private/confidential” and with sufficient postage to the following address:

MD ELEKTRONIK GmbH

Legal & Risk

Postfach 13 53

84466 Waldkraiburg

Germany

- Submitting information by mailbox

The Legal & Risk department has a generally accessible mailbox in which information can be posted, also anonymously.

Regardless of how information is submitted to MD, all information will be directly examined in the same way. Confidential treatment of the information and the contained data is ensured in all channels.

3 Steps of the complaints procedure

- Arrival of the complaint or information

When an information is submitted, it is documented internally and the person who submitted the information – if this person is known – receives a confirmation of receipt.

- Examining the complaint or information

The complaint or information is examined and the further procedure and responsibilities are defined. If examination proves that more details are required to make a final assessment of the facts, the Legal & Risk department contacts the person who submitted the information, if possible, in order to obtain more details. If the details are not sufficient and it is not possible to contact the person, the case will be closed.

- Clarifying the facts

The facts are discussed extensively by Legal & Risk or, with respect for the principle of confidentiality and data protection, forwarded for further investigation to the competent entities, e.g. within the company. If necessary and where possible, this takes place together with the person who submitted the information.

- Finding a solution

If, following an assessment by Legal & Risk or the competent entities, the investigation confirms risks regarding human rights and/or the environment or violations of due diligence obligations, a suggestion for further course of action (in particular preventive and remedial measures) is elaborated and where possible and appropriate, the person who submitted the information is informed of this.

- Implementing remedial measures and follow-up

The remedial measures are implemented and followed up by the member of staff involved in the complaints procedure.

- Conclusion of the procedure and documentation

The complaints procedure is documented on a case-by-case basis. If it is possible to contact the persons who submitted the information, they will be informed of the procedure's conclusion. Processing time depends on the case and can therefore take between a few days and several months to complete.

4 Protection of the persons submitting the information from discrimination or penalization

Protection of the persons who submitted the information from discrimination or penalization due to having submitted an information or complaint concerning actual or suspected misconduct, made in good faith and without malicious intent, is an important part of our complaints procedure. MD will not tolerate any retaliation measures or reprisals or any direct or indirect discrimination towards the persons who submitted the information and will pursue any cases of this with all due consistency.

Legal Notice

Company Address

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Executive Board

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Ctibor Žižka
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VAT Number

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Register Court

Traunstein (Germany) HRB 1514

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