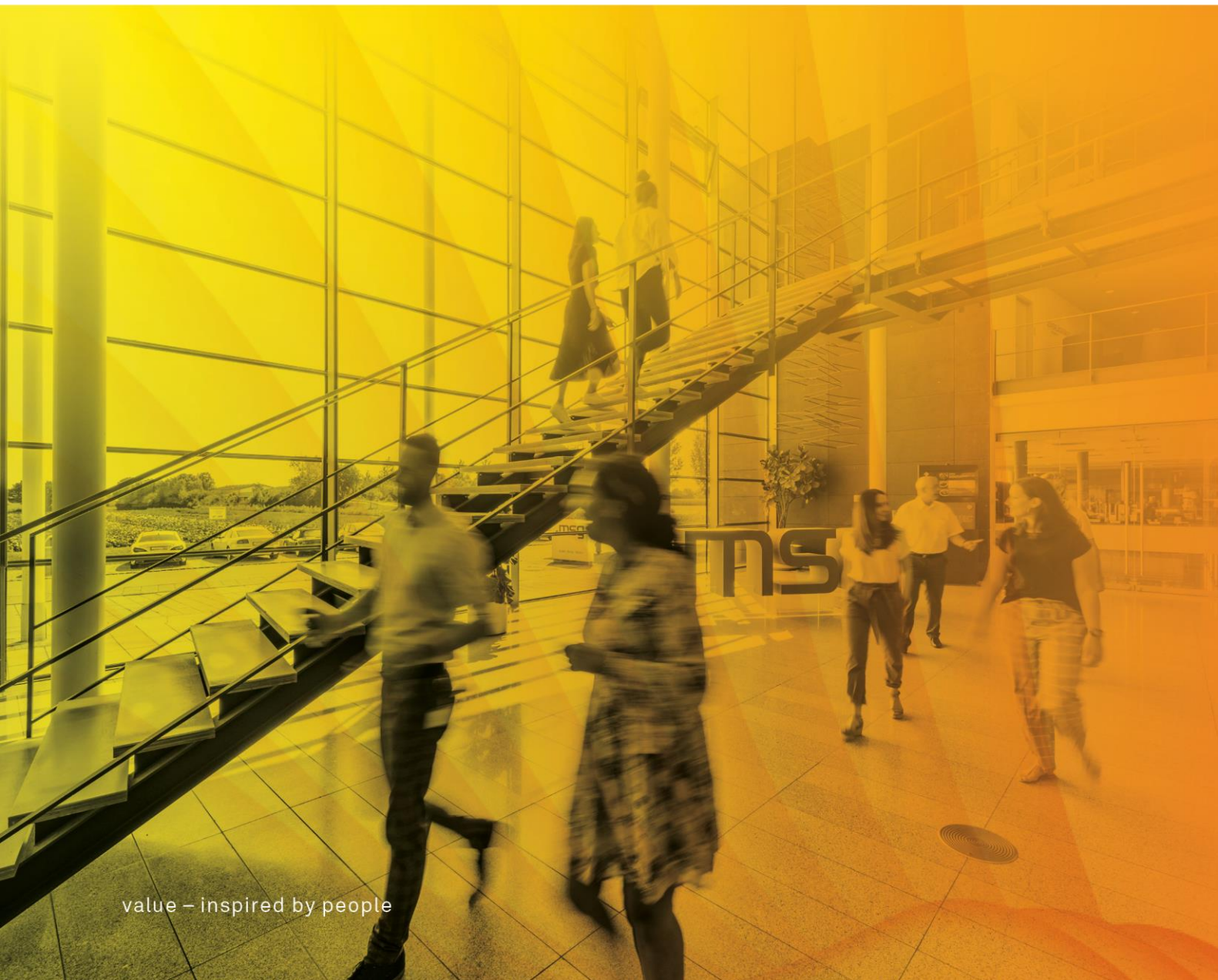




Complaint Procedure in accordance with the German Supply Chain Due Diligence Act ("LkSG")

msg group GmbH and msg systems ag



With these Rules of Procedure msg group GmbH and msg systems ag (hereinafter collectively referred to as “msg”) set out their company's procedure for complaints which has been established in accordance with Section 8 LkSG.

Purpose

The complaint procedure is a core element of the corporate due diligence duties arising from the LkSG, through which msg can be notified of human rights or environmental risks or breaches in its business or supply chain.

The purpose of these notices is to identify hazards to people or the environment at an early stage and to prevent actual damage. If any imminent or actual breaches of duty are identified, the complaint procedure provides access to appropriate redress.

Scope

The complaint procedure can be used to provide information on human rights and environmental risks, as well as provide information on breaches of human rights-related or environmental duties that have arisen because of msg's economic activities in its business area or those of a direct or indirect supplier.

The complaint procedure is available to all company employees and external parties.

Reporting Channel

msg has a digital whistleblowing system for the complaint procedure that can be accessed anywhere and at any time via an [external internet platform](#). After the report has been submitted, further communication takes place via a secure mailbox set up in this system specifically for this case.

Competence and Responsibility

Only competent and qualified msg employees in the group compliance department are entrusted with the complaint procedure. In this function, they act impartially, for instance independently, they are not bound by instructions and are bound to secrecy. These employees are specially trained to perform their tasks and have sufficient time resources. Therefore, they can understand and assess the situation, the procedure from the perspective of the reporting person and further processing.

Procedure

1. Receipt of Report and Case Acceptance

Once a report has been received via the reporting channel, the case will first be registered by a central reporting office and the reporting person will receive feedback of receipt no later than 7 days afterwards.

In an initial analysis, the reporting office will check whether the reported information falls within the scope of the complaint procedure under the LkSG and is valid. If the reported information does fall within the legal scope of the complaint procedure and there is a reasonable initial suspicion, the reporting office will accept the case. Otherwise, the case will not be pursued by the reporting office and the reporting person will thus be informed. If the report concerns the responsibility of a separate reporting office within msg, the case can also be handed over to the responsible investigation unit in consultation with and with the consent of the reporting person.

2. Investigation

The reporting office will investigate the accuracy of the allegation made in the report or it will pass the information for investigation on to another relevant decentralized unit within msg, e.g., human resources or the legal department, while maintaining the principle of confidentiality and data protection. The investigation of the reported information will generally take place in dialogue with the reporting person.

If the investigation shows that human rights or environmental risks or breaches are possible, imminent or have already occurred within msg's own business area or that of its suppliers msg will derive the appropriate remedial and/or preventive measures, which can also be worked out in dialogue with the reporting person.

3. Case Closure

The reporting person will receive feedback on the outcome of the investigation to date and any remedial and preventive action taken within 3 months of acknowledgement of receipt. In some cases, investigating may take longer.

Each registered case is documented and retained in accordance with legal requirements.

Identity Confidentiality

When using the complaint procedure, the reporting persons are free to provide information about their identity. The personnel, organizational and technical design of the complaint procedure ensures the confidentiality of the identity of the reporting persons and always protects their personal data, provided this does not conflict with statutory or official disclosure and reporting duties. The same applies with respect to the confidentiality of the identity of any other person named in a notice.

Protection against Discrimination and Punishment

msg will not tolerate any retaliation against any reporting persons for submitting reports via the complaint procedure that relates to actual or suspected misconduct, and which is given in good faith. If any reporting persons are subjected to reprisals by employees or suppliers of msg, msg will examine the situation as soon as it becomes aware of. If necessary, msg then initiates appropriate and given measures.

Reviewing Effectiveness

The effectiveness of the complaint procedure will be reviewed once a year and incident related.