

# Rules of Procedure for the Phoenix Contact Group Complaints Process



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## 1 Preamble

These rules of procedure transparently illustrate the **complaints process at Phoenix Contact in accordance with Sections 8 and 9 para 1 German Supply Chain Act (GSCA; in German “Lieferkettensorgfaltspflichtengesetz”)**. At Phoenix Contact, the complaints process is handled by the BKMS<sup>®</sup> whistleblower system. The system provides all employees, suppliers, and other affected persons in our supply chain with a protected communication channel for relevant information.

## 2 Scope

The complaints process enables any person to point out, among other things, **risks related to human rights and the environment** and any **violations of obligations related to human rights or the environment** that have arisen due to the economic actions of Phoenix Contact in its own business area or of a direct or indirect supplier of Phoenix Contact. The complaints process can be used in particular by all persons affected by violations of human rights or environmental due diligence obligations made by Phoenix Contact, our subsidiaries, or our suppliers.

However, the complaints process is **not** intended for concerns regarding our range of products or service portfolio. For matters related to such concerns, please use the contact options on our website.

## 3 Entrusted body

The office entrusted with the BKMS<sup>®</sup> whistleblower system or the complaints process as per GSCA is the Corporate Compliance Management team of the Phoenix Contact Group. The staff of Corporate Compliance Management processes, investigates, and clarifies information in the BKMS<sup>®</sup> whistleblower system. In accordance with Section 8 para 3 GSCA, such persons are bound to confidentiality and their actions are impartial, independent, and free of instructions.

## 4 Submitting information

### 4.1 How can information be submitted?

To submit a report or information, people submitting such information may make use of the free digital BKMS<sup>®</sup> whistleblower system, which can be accessed online. Generally, this system works on all devices (e.g., computers, smartphones, tablets, etc.).

The BKMS<sup>®</sup> whistleblower system is certified as barrier-free, which means it can also be used by the hearing or visually impaired. It is currently available in six languages, although generally, information can be submitted in any language. If information is reported in a language other than German/English, an authorized translation service provider is contracted through the encrypted BKMS<sup>®</sup> whistleblower system.

Click here to go to the BKMS<sup>®</sup> whistleblower system: [Whistleblower system | PHOENIX CONTACT](#)

### 4.2 Can information be submitted anonymously?

Whistleblowers have the opportunity to report information anonymously through Phoenix Contact's BKMS<sup>®</sup> whistleblower system. Please observe the following information on how to communicate using an (anonymous) mailbox.

### 4.3 How is information communicated?

The submission of information and provision of additional communication is confidential and protected by means of a separate mailbox in each case. This is why a process is available to submit information anonymously with the BKMS<sup>®</sup> whistleblower system. If the person providing the information wishes, he or she can remain anonymous during the entire communication process.

Please note that setting up a mailbox is **not an obligation**. It is, however, essential for certain process steps provided for in GSCA, such as the detailed discussion of information. Setting up a mailbox is therefore **recommended**.

## **5 Process steps and timeline: How do we process information?**

### **5.1 Verifying validity**

Information submitted is documented in the BKMS® whistleblower system and initially reviewed by legal counsel from an international law firm. In this first step, the information is checked for plausibility and validity. After the review is completed, the information is disclosed to the Corporate Compliance Management team of the Phoenix Contact Group.

### **5.2 Confirming receipt of information**

After Phoenix Contact's Corporate Compliance Management has received the information, the person who has submitted the information will receive electronic confirmation within the legally defined time period that the information has been received. This requires that a mailbox is set up (see Section 4.3).

### **5.3 Verifying the facts**

Corporate Compliance Management carefully reviews the information and initiates appropriate measures. If a mailbox has been set up, the person who submitted the information can be contacted to further discuss the stated facts (e.g., to obtain further necessary information in order to investigate and clarify the facts and/or ask questions of understanding). The information is reviewed on the basis of internal regulations, accounting for the interests of all parties involved and, if necessary, involving relevant internal departments (e.g., Corporate Purchase or Corporate Human Relations).

### **5.4 Initiating subsequent measures**

If the initial suspicion is substantiated, subsequent measures are initiated to investigate and clarify the suspicion and any uncovered grievances are remedied as quickly as possible. Relevant measures are documented, processed, and tracked in a structured manner.

### **5.5 Duration of the process**

The duration of the process cannot be determined in advance. It depends on the scope and complexity of the information, which means that clarifying and investigating information can take anywhere from a few days to several months. In any event, the company should conduct the investigation and without culpable delays.

### **5.6 Informing the whistleblower**

If a mailbox has been set up, the person who submitted the information is regularly informed about the status of the process and, if possible within the scope of the investigation and clarification, about the further procedural steps. Transparent communication on how the information is handled can only be provided in cases in which the information does not conflict with any legal regulations or protected interests of other persons or companies (e.g., existing confidentiality obligations or data protection regulations).

### **5.7 Concluding the process**

The company considers the complaint process to be completed once all defined measures have been processed in a structured manner and no further measures are required. If a mailbox has been set up, the person who submitted the information will receive the results and will be notified that the process has been concluded.

## **5.8 Dismissing the process**

If the initial suspicion relating to the submitted information is not substantiated, the complaints process is dismissed. If a mailbox has been set up, the person who submitted the information is notified that the process was dismissed and the reasons.

# **6 Procedural principles for the protection of the persons involved**

## **6.1 Anonymity and protecting confidentiality**

The BKMS® whistleblower system is a certified system equipped with the function of preserving anonymity and can therefore be used completely anonymously. Upon request, information can be submitted without revealing the identity of the person. The electronic mailbox also enables an anonymous dialog for follow-up questions and discussion of the facts (see Section 4.3). The system can be used online outside the company and is located on an external server. It is not possible to trace the submitted information. Furthermore, the persons entrusted with implementing the complaints process are bound to secrecy. This does not apply to any applicable legal or regulatory obligations to disclose or report information.

## **6.2 Protecting whistleblowers from disadvantages**

Phoenix Contact investigates all information seriously and conscientiously. Discrimination, retaliation, or other reprisals against persons who, to the best of their knowledge and belief, report suspected wrongdoing to Phoenix Contact or participate in the investigation of information will not be tolerated.

Persons who, to the best of their knowledge and belief, provide information about risks related to human rights and the environment and about violations of human rights and environmental due diligence are protected by Phoenix Contact and need not fear any measures that would be detrimental to them. This shall also apply if information does not prove to be justified upon closer examination, unless such information contains deliberately or grossly negligent untrue statements.

## **6.3 Protecting accused persons**

Persons under suspicion as a result of the submitted information are presumed innocent until a violation of the human rights and environmental due diligence as stated under GSCA has been proven. The investigation and clarification of information involves both incriminating and exonerating facts in equal measure.

## **6.4 Data protection**

Data protection requirements are fully met in accordance with the General Data Protection Regulation (GDPR) as part of the complaints process.