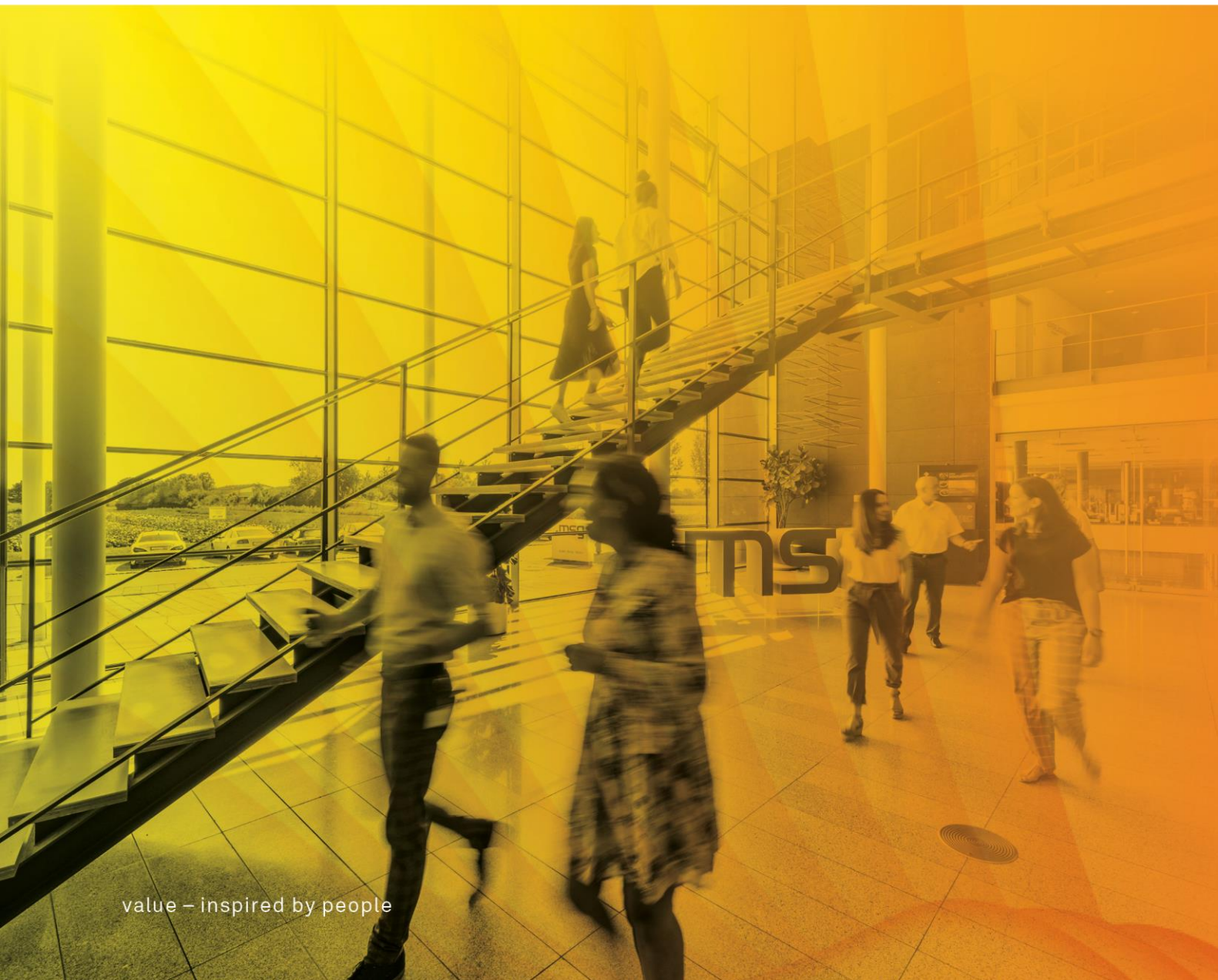




Rules of Procedure for Complaints Pursuant to § 8 German Supply Chain Due Diligence Act ("LkSG")

msg systems ag



With these Rules of Procedure msg sets out the company's procedure for complaints which has been established in accordance with § 8 LkSG.

Goals

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 as a result 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.

Channel for Complaints

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

Responsibility

Only suitable and qualified msg employees are entrusted with implementing the complaint procedure. In this function, they act impartially, i.e., 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 to understand and assess the situation and the procedure from the perspective of the reporting person and they are able to process it further.

Procedure

1. Receipt of Information and Case Acceptance

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

In an initial analysis, the reporting office will check whether the facts reported fall within the scope of the complaint procedure under the LkSG. If the examination shows that the facts reported fall within the scope of the complaint procedure, the reporting office will accept the case to further clarify the facts. Otherwise, the case will not be pursued by the reporting office and the reporting person will be informed. If the facts reported concern an area of responsibility of another complaint unit 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 validity of a facts reported or it will pass the case on to another respective decentralized organizational unit within msg, e.g., human resources or the legal department, for investigation while continuing to maintain the principle of confidentiality and data protection. Clarification of the facts reported will usually take place with the reporting person.

If the investigation comes to the conclusion that human rights or environmental risks or breaches appear possible, are imminent or have already occurred in msg's business area or that of its suppliers, msg will derive the appropriate remedial and/or preventive measures, which can also be worked out 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, processing may take longer.

Each registered case is documented and retained in accordance with the 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 protects their personal data at all times, 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 using the complaint procedure to provide information that relates to actual or suspected misconduct, and which is given in good faith. In the event that any reporting persons are subjected to reprisals by employees or suppliers of msg, msg will examine the situation as soon as it becomes known and, if necessary, initiate the appropriate measures within the scope of the possibilities available to it.

Reviewing Effectiveness

The effectiveness of the complaint procedure will be reviewed once a year and on an ad hoc basis.