

# Procedure

## WashTec Group Grievance and Reporting Procedure<sup>1</sup>



# 1. Purpose and objective

The German Supply Chain Act (LkSG) entered into force on January 1, 2023. The **WashTec Group**<sup>1</sup> (hereinafter also referred to as "**WashTec**" or "**we**") does not currently fall within the scope of the Supply Chain Act. We nevertheless attach great importance to responsible management of our supply chain with regard to human rights and environment-related matters.

Equally, we consider information about individual misconduct or potential for improvement in our compliance organization to be an important element of our compliance culture. Compliance with laws, regulations and in-house policies (in particular, the WashTec Code of Conduct and WashTec Supplier Code of Conduct) is essential to our business success. Misconduct and violations of applicable laws, the Code of Conduct, the Supplier Code of Conduct and other internal policies will not be tolerated. We expressly welcome information about potential misconduct and will protect whistleblowers as required by the German Whistleblower Protection Act, which entered into force on July 2, 2023.

This Grievance and Reporting Procedure (hereinafter "**Procedure**") ensures proper investigation of any information about human rights or environmental risks or violations within the meaning of the German Supply Chain Act ("Grievances") or about other violations of applicable law or of internal stipulations ("Reports"). This procedure is standardized for the entire WashTec Group. An electronic grievance and reporting system ("**whistleblower system**") is available for the submission of information. Information can be submitted confidentially and, if desired, anonymously on the [whistleblower system website](#).

<sup>1</sup> This Grievance and Reporting Procedure serves to implement the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz/LKSG) and the German Whistleblower Protection Act (Hinweisgeberschutzgesetz/HinSchG)

<sup>2</sup> This grievance procedure applies to WashTec AG and all affiliated companies. A list of affiliated companies can be found in the annex.



## 2. Who may use the Grievance and Reporting Procedure

Anyone can submit information to us. This includes, but is not limited to:

- (Future and former) employees and temporary workers
- Business partners
- Direct and indirect suppliers
- All parties potentially involved in the supply chain and all potential affected parties.



## 3. What information may be submitted

The information that may be submitted comprises information about human rights and environment-related risks and about violations of human rights and environment-related prohibitions under section 2 (2) and (3) of the German Supply Chain Act that have arisen as a result of the economic activities of the WashTec Group in its own operations or at a direct or indirect supplier of the WashTec Group.

These include (but are not limited to) the following prohibitions:

### Human rights-related prohibitions

- Prohibition of child labor
- Prohibition of slavery
- Prohibition of forced labor
- Prohibition of disregard for occupational safety and health and related health hazards
- Prohibition of discrimination
- Prohibition of the unlawful taking of land
- Prohibition of withholding fair wages
- Prohibition of disregard for the right to form trade unions or employee representations
- Prohibition of causing harmful changes to the soil or contamination of waters

### Environment-related prohibitions

- All environment-related prohibitions where non-compliance can also lead to human rights violations (such as poisoned water)
- Prohibitions regarding the manufacture, use or treatment of:
  - Mercury according to the Minamata Convention
  - Chemicals according to the Stockholm Convention
  - Non-environmentally sound management of wastes in accordance with the Basel Convention.

Information may also be reported on potential other violations by WashTec of applicable law and in-house policies (in particular the Code of Conduct).

Information is to be provided to the best of the submitter's knowledge and belief. Mere assumptions should be identified as such. Knowingly providing false information is not permitted; knowingly providing false information is a criminal offense in many countries and may result in contractual consequences, including termination.



## 4. Grievance and reporting channels

The WashTec Group operates a whistleblower system that can be used free of charge and, if desired, anonymously.

You can access the whistleblower system website using the following link:

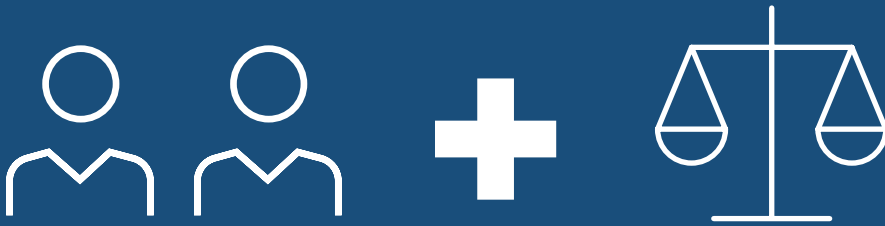
WashTec [whistleblower system](#)



The WashTec whistleblower system (BKMS® Incident Reporting) is an external system independent of WashTec's IT infrastructure. The technical provider – Business Keeper GmbH – is specialized in handling confidential information and does not have access to the information you submit.

Information can be submitted in various languages and you can access the system at any time. Information submitted is processed only by the responsible office within the WashTec Group – see Section 5. A. *Responsibilities and access to submitted information*.

As a matter of course, all employees of the WashTec Group can continue to confidentially address any concerns with their known points of contact within the organization (including supervisors, works councils, and human resources, legal and internal audit departments).



# 5. Processing of information submitted using the Procedure

## **a. Responsibilities and access to submitted information**

The Corporate Internal Audit and the Legal and Compliance Department are responsible as the Central Contact Point for establishing, operating and regularly reviewing the Grievance and Reporting Procedure. The employees of the Central Contact Point are trained specialists who report directly – and subject to the maintenance of confidentiality – to the Management Board of WashTec AG, the parent company of the WashTec Group. They are not subject to any substantive instructions in the performance of their duties in connection with the Grievance and Reporting Procedure.

Only the Central Contact Point and, if necessary, professional outside lawyers, investigators and auditors have access to the information submitted, conduct the investigation and follow up the matter. However, WashTec may be required by law to provide information about compliance violations to certain government agencies. Other WashTec depart-

ments may be informed and involved where necessary to clarify and rectify allegations. All persons involved in the processing of submitted information are bound by confidentiality obligations.

## **b. Confirmation of receipt**

The receipt of submitted information will be confirmed within seven (7) days. No confirmation of receipt is issued if there is no means of contacting the whistleblower.

If further information is required from the whistleblower to assess the facts of the case and there is a means of contact, the Central Contact Point will contact the whistleblower as necessary.



**c. Processing and reviewing submitted information; investigations**

WashTec treats all submissions carefully, promptly and confidentially.

Each submission will first be reviewed to determine whether the reported facts involve a reportable violation or risk of such a violation, as described in Section 3 of this Procedure, and whether the information provided is sufficient to proceed.

- If the investigation concludes that there is no reportable violation or risk of violation, or that the information is insufficient to make an assessment and sufficient information cannot be obtained through appropriate means, this fact will be documented and the whistleblower will be notified of the result of the investigation together with the reasons. The matter will not be pursued further unless new information becomes available.
- If the investigation concludes that there may be a reportable violation, the matter is followed up and investigated. If there is a means of contact, the Central Contact Point will contact the whistleblower to clarify the facts of

the matter. Others may be involved in the investigation as needed. The investigation concludes with a documented outcome.

Investigations are subject to the “fair trial” principle. If, for objective reasons (such as personal involvement in a reportable matter), there is a possibility that an officer of the internal contact point may not be able to resolve the matter impartially, the matter will be referred to another officer of the internal contact point for further processing. If an officer of the internal contact point has reason to believe that they are subject to a conflict of interest, they must report this without delay.

WashTec will inform the whistleblower within three (3) months of the current status of the investigation and state the reasons for the action taken.



### **d. Review and conclusion of the procedure**

If the investigation comes to the conclusion that a reportable violation as listed in Section 3 has occurred, or there is a risk of such a violation, in the WashTec Group's own operations or at its direct or indirect suppliers, suitable action to prevent, stop or minimize the violation is taken without delay. If appropriate, following clarification of the facts, a remedy may be proposed in consultation with the whistleblower. The decision on specific action to be taken lies with the full Management Board of WashTec AG.

The whistleblower will be informed as soon as possible of the outcome of the procedure.

### **e. Documentation, storage and deletion of submitted information**

All information submitted is properly registered and documented, with protected access. Statutory retention periods applying to supplemented information are duly observed.





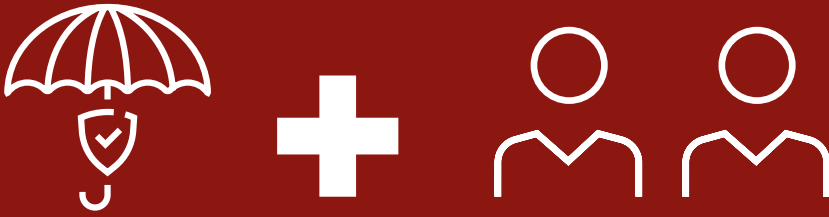
## 6. Confidentiality

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All information submitted is treated confidentially. This includes, in particular, information that may disclose the identity of a whistleblower.

The identity of the persons and information referred to may be disclosed only to those responsible for processing submitted information or who assist in the fulfillment of their duties (see Section 5a, *Responsibilities and access to submitted information*).

As we seek open communication with our employees and others, we would like to encourage you to disclose your identity if you use the whistleblower system. This makes it easier to clarify the facts of the matter.



## 7. Protection of whistleblowers

WashTec will not tolerate reprisals against whistleblowers. We will protect anyone who speaks up in good faith, even if a concern turns out to be unfounded.

We also treat all submitted information confidentially (see Section 6, *Confidentiality*).

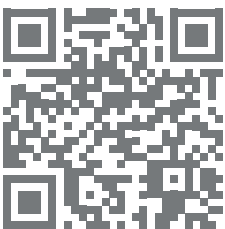


# 8. Effectiveness review of the grievance procedure

The effectiveness of the Grievance and Reporting Procedure is reviewed annually and on an ad-hoc basis.

### **Point of contact and responsibility**

The point of contact for this Procedure and for updates to this Procedure is the Legal and Compliance Department of WashTec AG. You can contact the Legal and Compliance Department at [legal@washtec.com](mailto:legal@washtec.com).





# Annex: List of WashTec companies

Country	Company
Germany	WashTec AG
Germany	AUWA-Chemie GmbH
Germany	WashTec Carwash Management GmbH
Germany	WashTec Cleaning Technology GmbH
Germany	WashTec Financial Services GmbH
Germany	WashTec Holding GmbH
Australia	WashTec Australia Pty. Ltd.
Austria	WashTec Cleaning Technology GmbH
Canada	WTM VII Cleaning Technologies Canada, Inc.
Czech Republic	WashTec Cleaning Technology s.r.o.
Denmark	WashTec A/S
France	WashTec France S.A.S.
Great Britain	WashTec UK Ltd.
Italy	WashTec S.r.l.
Netherlands	WashTec Benelux B.V.
New Zealand	WashTec New Zealand Ltd.
Norway	WashTec Bilvask AS
Poland	WashTec Polska Sp. z o.o.
Spain	WashTec Spain, S.A.U.
Sweden	WashTec Nordics AB
United States of America	Mark VII Equipment Inc.

