

## **Rules of Procedure**

### **Introduction**

Musashi Europe GmbH is committed to responsible business conduct and explicitly includes its supply chains besides its own business area in the consideration. For us, responsible business conduct also includes the continuous review and further development of our processes to comply with due diligence obligations. In this context every hint is appreciated.

We therefore created different channels which can be used to report concerns regarding possible human rights or environmental violations in the narrower or expanded business framework of Musashi Europe GmbH and to bring potential grievances in our own business area or that of one of our suppliers to our attention.

The following examples of possible risks or violations may be subject of such a notice:

- Human Rights Risks/Violations
  - Failure to comply with occupational health and safety (according to national regulations), child labour below the minimum permitted age/forced labour/slavery or practices similar to slavery
  - Disregard for freedom of association or discrimination
  - Deprivation of decent wages
- Environmental Risks/Violations
  - Causing harmful soil change, water and air pollution
  - Harmful noise emissions and excessive water consumption

We ensure the confidentiality of identity and the protection of all whistleblowers. Discrimination against a person on base of a reported violation, which was made to the best of knowledge, will not be tolerated. Whistleblowers do not have to fear any consequences if they do not violate applicable law themselves. Please note that the provision of knowingly false or misleading information may result in prosecution and penalties.

If you have indications that you are exposed to discrimination due to a report made to the best of your knowledge, this can also be reported via one of the external reporting channels.

The reporting process is described below.

### **Step 1: Making contact**

There are several channels available for you to submit a note:

#### **By post:**

Dr. Menderes Güneş  
c/o Güneş & Hamdan Rechtsanwälte PartGmbH  
Stengelstraße 1  
66117 Saarbrücken

#### **By phone:**

+49 (0)681 / 968659-0

#### **By mail:**

musashi-compliance@gh-legal.de

**Online (start with the new website):**

[www.eu.musashi-group.com](http://www.eu.musashi-group.com)

Reports can be submitted in English or German language via all reporting channels.

When using our online reporting channels, reports can be submitted around the clock, seven days a week and worldwide. If you wish, using these options you can submit your report anonymously.

**Step 2: Acknowledgment of receipt within seven days**

All whistleblowers, with the exception of completely anonymous reporters, will generally receive an confirmation of receipt and a contact person for the further course of the procedure within seven days.

**Step 3: Plausibility check**

After receiving your report, our external partner first checks the plausibility of the report and determines the internal responsibilities. In the course of this, possible ambiguities are clarified through queries and the exchange with the whistleblowers, unless the report was submitted completely anonymously. If other parties are responsible for the issue you're reporting, even if it falls into one of the reporting categories, your report will be forwarded to. In the event of a rejection, the whistleblowers will be informed, stating the appropriate reasons.

**Step 4: Further clarification of the facts in exchange with whistleblowers and, if necessary, involvement of other stakeholders**

If possible, for further clarification of the facts and circumstances, other involved parties will be asked for contribution after consultation with the whistleblower. Suspicious cases are investigated by internal or external controllers. Afterwards measures are developed to systematically investigate any violation.

Within the statutory period and after confirmation of receipt, the result and derived measures will be communicated to the whistleblower.

**Step 5: Completion of the procedure and archiving**

The case and the remedial measures are documented and archived by us in accordance with the legal requirements. Voluntary feedback from the whistleblowers, after completion of the procedure on the overall process, helps us to further develop and review the effectiveness of our complaints procedure on an annual basis.

We are strived to comply with the procedural deadlines. In individual cases, if a delay is foreseeable due to additional measures to clarify the facts, the whistleblowers will be informed accordingly.

## **Anonymity**

All reports and personal information are subject to confidentiality within the framework of the legal provisions. In addition, reports can also be submitted completely anonymously using an online reporting channel. Please note that, for technical reasons, in the case of anonymous submissions only limited feedback can be given to the whistleblower.

## **Confidentiality**

- Regardless of the reporting channel, the information given by you will be treated confidential and will only be passed on to the responsible parties for further processing.
- The information you report may result in the initiation of internal and official investigations and other consequences. Therefore, only information that you can reasonably believe to be accurate should be submitted. Arbitrary information may result in corresponding consequences.
- Please note: These reporting channels are not an emergency service! Please do not use this service to report an imminent threat to life, health or property, as this communication channel is not designed for this.

All receipts will be processed for further use in accordance with the legal requirements and considering the protection of whistleblowers.