

Rules of procedure for the complaints procedure pursuant to section 8 of the Supply Chain Act

As of: July 2025

Scope

This document outlines the complaints procedure of Hauck Aufhäuser Lampe Privatbank AG (HAL) under the Act on Corporate Due Diligence Obligations in Supply Chains (Supply Chain Act – SCA) for persons or groups of persons who wish to raise concerns regarding compliance with human rights and/or environmental due diligence obligations in connection with HAL's business activities or its business partners (hereinafter: complaints procedure).

Who can submit a complaint?

The complaints procedure is available – internally and externally – to all persons or groups of persons who are potentially affected by human rights or environmental violations in connection with HAL's business activities or those of its business partners or who have knowledge of such a violation.

What issues can be reported?

The approach to reporting issues regarding the SCA is very broad. All matters can be reported that are based on a possible existing or imminent violation of human rights and/or environmental due diligence obligations in HAL's business area or at one of its suppliers.

A violation of human rights and/or environmental due diligence obligations includes, for example:

- Child labor,
- any form of forced labor or slavery,
- disregard of occupational health and safety standards,
- violation of freedom of association, in particular the right to form or join a trade union,
- unequal treatment of employees based on national and ethnic origin, social background, health status, disability, sexual orientation,

age, gender, political opinion, religion or belief, in particular the payment of unequal remuneration,

- withholding of an appropriate wage in accordance with local legislation at the place of employment,
- environmental damage affecting the conservation, production and access to food, drinking water, sanitary facilities or human health in general,
- other environmental damage, such as the manufacture of products containing mercury or other pollutants and the improper disposal of hazardous waste.

How can complaints be submitted?

HAL has a web-based, independent whistleblower system that acts as an integrated system for the SCA and the Whistleblower Protection Act. You can use this system to submit complaints or disclosures of human rights and/or environmental risks or violations in connection with HAL's business activities or those of its business partners.

The system can be accessed online via the following link on HAL's website:

<https://www.hal-privatbank.com/en/whistleblower-system>

When asked about the type of disclosure to be reported, the disclosure types "Human rights risks / violations", "Environmental risks / violations" or "Violations committed by suppliers in the supply chain" can be selected and a corresponding report submitted.

If a business partner of HAL is involved in the respective incident, this can be indicated when asked about the involvement of a supplier or subcontractor.

To enable a proper review, the report should contain the following information:

- Names of the people involved,
- names of any witnesses (if applicable),
- date, time and location of incident(s),
- details of any proof,
- money or assets involved,
- frequency of the incident.

If desired, reports can be filed anonymously. When personal data is provided, it is treated confidentially.

The submission of a report is free of charge.

How will complaints be processed?

The informant receives a confirmation message within seven working days.

Incoming reports are initially reviewed by the Compliance department. If a report indicates a human rights or environmental risk in connection with HAL's business activities or those of its business partners, HAL's Human Rights Officer is involved.

If the report does not fall within the scope of the complaints procedure, the informant will be notified within fourteen working days of the confirmation message. In the event of a rejection, the informant will be given a statement of reasons.

If the report falls within the scope of the complaints procedure, HAL's Human Rights Officer is involved.

If the investigation reveals a violation of a human rights or environmental obligation in connection with HAL's business activities or its business partners, HAL's Human Rights Officer will initiate appropriate preventive and/or remedial measures.

The informant can check the status of the report and any associated communications at any time by entering the report ID (and, if applicable, a password) into the system.

Data protection, confidentiality and review

The confidentiality of the informant's identity will be maintained at any time. HAL prohibits any

form of discrimination and/or punishment based on concerns raised.

The persons entrusted with the complaints procedure are obliged to maintain confidentiality and comply with data protection.

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The effectiveness of the complaints procedure is reviewed once a year and as required.