

## **Rules of Procedure for the Complaints Mechanism Pursuant to Section 8 of the German Supply Chain Due Diligence Act**

As one of the leading corporate groups in Europe specializing in the recycling and trade of metals, TSR Group is aware of its social and environmental responsibility. We are committed to respecting human rights and protecting the environment — both within our own operations and, to the extent of our influence, along the supply chain. In line with the German Supply Chain Due Diligence Act (LkSG), we have established a complaints mechanism that enables individuals to report human rights or environmental risks, as well as violations of related due diligence obligations. This mechanism is an integral part of our commitment to transparency and sustainable business practices.

The complaints mechanism is open to all submissions that indicate potential human rights or environmental risks or possible breaches of due diligence obligations.

Possible human rights-related concerns may particularly relate to the following issues:

- Employment of children in supply chains or production facilities,
- Exploitation through forced labor or other forms of modern slavery,
- Inadequate protection of life and health in the workplace,
- Restrictions on freedom of association or obstruction of trade union activities,
- Discrimination in recruitment, remuneration, or promotion,
- Non-payment of or payment below a living wage,
- Environmental pollution affecting people's livelihoods,
- Disregard for existing land rights in favor of economic interests,
- Use of private or public security forces leading to unlawful interference due to lack of training or oversight,
- Other acts or omissions that violate individuals' rights in a particularly serious and manifestly unlawful manner.

Possible environmental risks or violations may include, among others:

- Violations of prohibitions under the Minamata Convention, particularly regarding the release of mercury into the air, soil, or water,
- Production, use, or improper disposal of prohibited substances within the scope of the Stockholm Convention (e.g., persistent organic pollutants),
- Unauthorized transboundary movement of hazardous waste in contravention of the Basel Convention.

These Rules of Procedure provide information about the complaints mechanism applicable to TSR Group and explain:

- the scope of the complaints procedure,
- the procedural steps,
- the guiding principles of the process, and
- the review and effectiveness of the mechanism.

## Scope of the Complaints Procedure

The TSR Group's complaints procedure serves two key functions: Firstly, it acts as an early warning system to identify human rights and environmental risks at an early stage. This enables the TSR Group and, where applicable, associated suppliers to jointly implement preventive measures pursuant to Section 6 of the LkSG, in order to effectively and appropriately mitigate the identified risks.

Secondly, the procedure allows for the immediate reporting of violations of human rights and environmental due diligence obligations under Section 2 (1)–(3) of the LkSG. In the event of such violations, the TSR Group commits to promptly, effectively, and appropriately implement the necessary remedial actions pursuant to Section 7 of the LkSG. Similar measures are also expected from the involved suppliers.

## Whistleblower or Complainant

The TSR Group's complaints procedure is open to all relevant internal and external stakeholders who may be affected by, or become aware of, human rights or environmental risks or violations related to TSR Group's business operations or supply chain. This includes, in particular, employees, business partners, individuals along the supply chain, as well as civil society actors. Access to the procedure is granted regardless of nationality or place of residence.

## Safeguarding individuals from adverse effects or retaliation due to a lodged complaint or whistleblowing

Persons submitting reports or complaints shall not face any disadvantages or sanctions. Protecting whistleblowers is a fundamental part of the complaints procedure. This protection is ensured through:

- Training and awareness-raising of the responsible personnel involved in the procedure,
- Transparency regarding the status of the procedure for the reporting person,
- Confidential handling of personal data and other information that could reveal the identity of the reporting person.

## Submission of reports or complaints

Complaints and reports can be submitted at any time via the group-wide complaints system of REMONDIS SE & Co. KG. As the parent company of TSR Group, REMONDIS SE & Co. KG confidentially forwards complaints and reports relating to TSR Group's own business operations or its suppliers to the responsible personnel.

Complaints and reports may be submitted by telephone, mail, or email in either German or English.

### – By telephone

|  |                   |
|--|-------------------|
| Anonymous compliance hotline                             | +49 2306 106-210  |
| Mister Dr. Ernst-Joachim Grosche<br>(CCO REMONDIS-Group) | +49 2306 106-8933 |
| Mister Simon Wessenbom<br>(Compliance Officer TSR Group) | +49 2306 106-3855 |

– **By mail**

Compliance-Department REMONDIS-  
Group:

REMONDIS Sustainable Services  
GmbH  
Department Compliance  
Brunnenstraße 138  
44536 Lünen

Compliance-Department  
TSR Group

TSR Group GmbH & Co. KG  
Department Compliance  
Brunnenstraße 138  
44536 Lünen

– **By mail**

Anonymous compliance email  
address REMONDIS-Group:

compliance@remondis.de

Mister Dr. Ernst-Joachim Grosche  
(CCO REMONDIS-Gruppe)

ernst-  
joachim.grosche@remondis.de

Mister Simon Wessenbom  
(Compliance Officer TSR Group)

s.wessenbom@tsr.eu

Regardless of the channel through which a report or complaint is submitted, internal handling is always conducted according to uniform standards.

## Procedure steps

To keep barriers to using the procedure as low as possible, TSR Group has decided to align the process with the recommendations<sup>1</sup> of the Federal Office for Economic Affairs and Export Control (BAFA):

1. Receipt of the complaint or report
  - Receipt is acknowledged and documented towards the reporting person.
2. Review of the complaint or report
  - The complaint or report is reviewed, and further procedure and responsibilities are determined. In case of rejection, the reporting person will be notified including the reasons.
3. Clarification of the facts
  - The facts are discussed and examined together with the reporting person. Optionally, a procedure for amicable dispute resolution may be considered.
4. Development of a solution with the reporting person
  - Based on step 3, a proposal for remediation is developed in consultation with the reporting person.

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<sup>1</sup> Further information can be found in the relevant guidance document provided by BAFA. It is available at: [https://www.bafa.de/EN/Supply\\_Chain\\_Act/Complaints\\_Procedure/complaints\\_procedure\\_node.html](https://www.bafa.de/EN/Supply_Chain_Act/Complaints_Procedure/complaints_procedure_node.html).

5. Remedial measures
  - The agreed remedial measures are implemented and monitored.
6. Review and closure
  - The achieved outcome should be evaluated jointly with the reporting person.
7. Effectiveness review
  - The effectiveness of the procedure is reviewed annually and on an ad-hoc basis. Adjustments to the procedure or remedial measures are made if necessary.

### **Costs of the Procedure**

Submitting reports or complaints is free of charge for both internal and external reporting persons as well as for complainants.

### **Review of the Effectiveness of the Complaint Procedure**

The effectiveness of the complaint procedure is reviewed annually and on an ad-hoc basis by the responsible personnel and the independently appointed human rights officer.

#### **The review is guided by two key questions:**

- Does the complaint procedure enable and encourage the target groups to submit reports or complaints even before a breach of duty occurs?
- What positive impacts does the complaint procedure contribute to in preventing harm and enforcing effective remedial measures in cases of violations of human rights and environmental obligations?

To this end, the measures taken and the incidents encountered are thoroughly documented and evaluated. The results are incorporated into the annual report pursuant to Section 10 (2) of the Supply Chain Due Diligence Act (LkSG) and are accessible on the TSR Group's website for seven years.