



## Rules of procedure for the complaints procedure of Trolli GmbH

### **Introduction**

Trolli GmbH Germany is obliged to comply with the German Supply Chain Due Diligence Act (LkSG) from 01.01.2024. This law regulates corporate due diligence obligations with regard to human rights and environmental issues in global supply chains.

Under the LkSG, Trolli GmbH is obliged to introduce an effective complaints procedure and make it publicly accessible. This procedure is intended to enable individuals and institutions to draw attention to LkSG-relevant risks and violations that arise or have arisen as a result of Trolli GmbH's business activities.

The identity of the complainant and the persons affected by the report is always under special protection. The employees who process the incoming complaints are obliged to maintain confidentiality and to act impartially.

Every complaint received is reviewed, evaluated and processed further with regard to its validity. Information and the associated documentation are stored for seven years in accordance with Section 10 (1) sentence 2 LkSG. The effectiveness of the complaints management system is reviewed by Trolli GmbH once a year and on an ad hoc basis.

You have two options for reporting a complaint regarding Trolli GmbH's human rights and environmental due diligence obligations: **Either** you visit the Trolli GmbH **online complaints portal** or you contact our complaints office **by post**:

Trolli GmbH  
For the attention of the complaints office  
Oststraße 94  
90763 Fürth

### **Instructions for reporting a complaint - by post**

If you choose the postal option, please include a telephone number or e-mail address in your letter so that our staff can contact you with the details of your complaint. You are not obliged to provide personal details (sender, name, address, etc.). Please note that if you provide personal data such as your name, your address or a clearly identifiable e-mail address, you are voluntarily giving up your anonymity.

### **Instructions for reporting a complaint - online complaints portal**

If you decide to use the online complaints portal, please proceed as follows:

1. Go to our company website at [www.trolli.de](http://www.trolli.de)
2. Change the website language at the top right from DE (German) to EN (English).
3. Scroll to the bottom of the page, where you will find the section "Our responsibility". Please click on this.
4. On the page that opens, you will find the headline "Social responsibility". Here you will find a link to access the online complaints portal. Click on this link and you will be redirected to the complaints portal.
5. In the first step, use the drop-down list to select the language in which you want the page to be displayed.



## COMPLAINT MANAGEMENT SYSTEM

### TROLLI GMBH

Select Language

 English

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By using the following complaints procedure, people can report human rights violations and violations of environmental protection regulations and thus contribute to limiting the consequences of such violations and preventing comparable misconduct in the future. Information on human rights or environmental risks can also be submitted via the complaints procedure. Other compliance violations, for example in the areas of data privacy, theft, competition and antitrust law, corruption, product safety, betrayal of trade and business secrets, fraud, money laundering, accounting fraud, environmental protection and other violations, can be reported by all employees via the complaints procedure.

- In the next step, click to select the risk categories that apply to your complaint. Multiple selection is possible. If you move the mouse pointer over the (i) next to the risk categories, you will receive explanatory information on the respective risk category.

### Report an incident

Select the type of report you would like to submit:  
(optional)

#### Supply Chain Due Diligence Act (LkSG)

Human Rights Violations (0/9) ^

Child Labour ⓘ Forced Labour ⓘ Slavery ⓘ Unequal Treatment in Employment ⓘ

Disregard for Freedom of Association ⓘ Occupational Safety ⓘ Inadequate Wage ⓘ

Forced Eviction ⓘ

Contracting Private or Public Security Companies when there is a Risk of Human Rights Violations ⓘ

Environmental Violations (0/4) ^

Mercury Ban ⓘ Ban on Persistent Organic Pollutants ⓘ

Ban on the Export of Hazardous Waste ⓘ Harmful Soil, Water and Air Pollution ⓘ

- Please describe the incident you have observed as precisely as possible. Fields marked with an \*star are mandatory and must be completed by you. All other fields are optional.

**Please describe the incident you observed:**

Subject \*

Please describe the violation, as accurately as possible. \*

In which countries did the violation occur? ▼



In which organizations did the violation occur ?

Which commodities are related to this violation?

What is your relationship to the affected business partner? ▼


Is the Incident still ongoing?


Yes  No

When did the violation start? \*  At what time? 

8. You can then upload any media (e.g. videos, photos, PDF files) that you may have relating to the incident. A direct voice recording is also possible if you would like to make verbal additions.

**If you have taken pictures or videos of the incident you can upload them here:**


 **UPLOAD MEDIA**


  
Add voice recording

Add voice recording

9. Please then select how you would like to submit your complaint. You have the option of submitting your complaint confidentially or anonymously.

**Would you like to report your observed incident anonymously or with an account?**

 **CONFIDENTIAL**

 **ANONYMOUS**

### Option: Confidential

- Select the "Confidential" tab.
- If you have already created a complaint reporting account in our complaints portal, then log in with your access data.
- If you do not yet have a complaint reporting account, please create one below. Please follow the instructions on the website.

**Create a new account**

Please complete the required fields marked with an asterisk (\*) for a successful submission.

First Name

Last Name

Please note that by entering your first name and last name, you voluntarily give up your anonymity.

Pseudonym\*

Password\*

Repeat Password\*

- If you would like to be automatically informed about the status of your complaint by e-mail, please activate the following option and enter an e-mail address:

Would you like to enter your e-mail address to be informed about the status?

E-mail \*

Please note that by entering your e-mail, you voluntarily give up your anonymity.

- Please confirm the privacy policy and the rules of procedure according to LkSG.

### Option: Anonymous

- Select the "Anonymous" tab.
- Please note the security notice listed as well as the privacy policy and the rules of procedure in accordance with the LkSG.
- Submit your complaint using the "Submit complaint" button.

➤ **SUBMIT COMPLAINT**

- You will then receive a message that your complaint has been reported.
- **Attention:** Please make a note of the displayed **status link (combination of numbers and letters, printed in bold)** to follow up on the status of your complaint!


<p><input type="checkbox"/> Your personal data will be processed in accordance with our <a href="#">privacy policy</a> .*</p> <p><b>Security Advice</b>          This complaints reporting page ensures the technical protection of the content shared by you, including your identity. To further enhance your security, please follow these instructions:</p> <ol style="list-style-type: none"> <li>1. If you would like to remain anonymous, please do not submit any personal information, e.g., your name or relationship with those involved. Also, please do not submit any information that can be traced back to you.</li> <li>2. If possible, do not submit your report through a technical device (e.g., PC, laptop, smartphone) provided by your employer. Using an intranet connection may, in particular, jeopardize your anonymity.</li> <li>3. Enter the link to the whistleblowing system directly in the address bar of your browser and, if necessary, bookmark it to access the system again at a later point in time (e.g. logging in to the postbox).</li> <li>4. Make sure that your internet connection is secure, which is indicated by the lock symbol next to the address bar.</li> </ol> <p style="text-align: center;"> <span style="border: 1px solid #ccc; padding: 2px 10px; margin-right: 10px;">READ PRIVACY POLICY</span> <span style="border: 1px solid #ccc; padding: 2px 10px;">READ CODE OF PROCEDURE (LKSG)</span> </p>	
<ul style="list-style-type: none"> <li>- Finally, submit your complaint using the "Submit complaint" button.</li> </ul> <div style="text-align: center; margin: 10px 0;"> <span style="background-color: #f4a460; color: white; padding: 5px 15px; border-radius: 3px; display: inline-block;">➤ SUBMIT COMPLAINT</span> </div> <ul style="list-style-type: none"> <li>- You will then receive a message that your complaint has been reported.</li> </ul>	

### Tracking the status of your complaint

To track the status of your complaint, please proceed as follows:

- For postal reporting: Once your complaint has been received by our complaints office, our employees will contact you either via the telephone number or e-mail address you have provided. In this context, the further communication channel can be determined together with you.
- When reporting via the online complaints portal:

<p><b>Option: Confidential</b></p> <ul style="list-style-type: none"> <li>- Please access the complaints portal via our website <a href="http://www.trolli.de">www.trolli.de</a>.</li> <li>- Now click on the "Login" button at the top right.</li> <li>- Now enter your user account details and log in.</li> </ul>	<p><b>Option: Anonymous</b></p> <ul style="list-style-type: none"> <li>- Please access the complaints portal via our website <a href="http://www.trolli.de">www.trolli.de</a>.</li> <li>- Now click on the "Login" button at the top right.</li> <li>- Scroll down a little and enter the status link displayed when submitting the complaint in the "Enter Complaint ID" field. Now click on the "Check complaint status" button.</li> </ul> <div style="text-align: center; margin: 10px 0;"> <div style="border: 1px solid #ccc; padding: 10px; width: fit-content; margin: 0 auto;"> <p style="margin: 0;"><b>ANONYMOUS SUBMISSION</b></p> <div style="border: 1px solid #ccc; padding: 5px; margin: 5px auto; width: 80%;">Enter Complaint ID</div> <div style="background-color: #ccc; padding: 5px; margin: 5px auto; width: 80%;">CHECK COMPLAINT STATUS</div> </div> </div> <ul style="list-style-type: none"> <li>- You will then receive an overview of the details and status of your complaint(s)</li> </ul>
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<div data-bbox="300 188 707 719" data-label="Form"><p>COMPLAINT MANAGEMENT</p><p><b>REPORTER SIGNIN</b> <b>PSEUDONYMOUS &amp; SECURE</b> Check in on the status of your complaints</p><input data-bbox="325 490 678 555" type="text" value="Pseudonym"/> <input data-bbox="325 573 678 638" type="text" value="Password"/> <input data-bbox="325 656 678 698" type="button" value="SIGN IN"/></div> <ul data-bbox="252 763 778 972" style="list-style-type: none"><li>- You will then receive an overview of the details and status of your complaint(s) and can contact our employees using the comment function. Here you can also see when our employees send you messages.</li></ul>	<p>and can contact our employees using the comment function. Here you can also see when our employees send you messages.</p>
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