

Rules of Procedure Grievance Mechanism

Ethics & Compliance

UEE Holding SE & Co. KG

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1 Basic information

The objective of this document is to describe the grievance mechanism of the UEE Holding SE & Co. KG and its subsidiaries (= ENERCON Group). As an expression of corporate responsibility and in line with the United Nations Guiding Principles on Business and Human Rights, the grievance mechanism provides potentially affected stakeholders with access to remedy.

The term grievance is defined as follows:

Grievance: general expression of dissatisfaction with a situation, activity, behaviour or a more specific and serious sense of wrongdoing relating to harassment, discrimination or other abuse (e.g. conflict, corruption, human rights violation, etc.)

In particular, this includes the violation of human rights-related or environmental obligations by the ENERCON Group or its business partners. An overview of exemplary human rights-related and environment-related breaches of duty is presented in Appendix 1.

The ENERCON Group's grievance mechanism is available not only to all employees of the ENERCON Group (including their legal representatives) but also to business partners (including their employees as well as their legal representatives) and otherwise affected persons (e.g. residents in the neighbourhood of an ENERCON Group production site) or organisations (e.g. media representatives, non-governmental organisations).

For process-related reasons, the ENERCON Group uses the already implemented whistleblowing system as a grievance mechanism. Irrespective of possible differences between the terms "report" and "grievance", the term "grievance mechanism" is understood to be equivalent to the term "whistleblowing system".

2 Channels for making a grievance

Grievances can be communicated to the ENERCON Group anonymously or non-anonymously. The following overview shows the available grievance channels. All grievance channels are available to complainants free of charge.

	ENERCON Corporate Governance Ethics & Compliance	Ombudsman
Contacts	Senior Director Corporate Governance Juliane Kanitz	Dr. Tobias Rudolph
Phone	+49 (0) 170 915 3446	+49 (0) 911 / 999 396 0
Email	compliance@enercon.de	rudolph@rudolph-recht.de
Letter	UEE Holding SE & Co. KG Juliane Kanitz - personally - Dreerkamp 5 26605 Aurich Germany	Rudolph Rechtsanwälte Partnerschaft mbB Westtorgraben1 90429 Nürnberg Germany
Mobile	+49 (0) 170 915 3446	+49 (0) 179 / 537 40 94
Digital Grievance Mechanism: enercon.integrityline.com		

The phone grievance channels can be reached on weekdays between 8 a.m. and 6 p.m. German time (UTC+1). Grievances can be voiced in German or English. It is possible to leave a message.

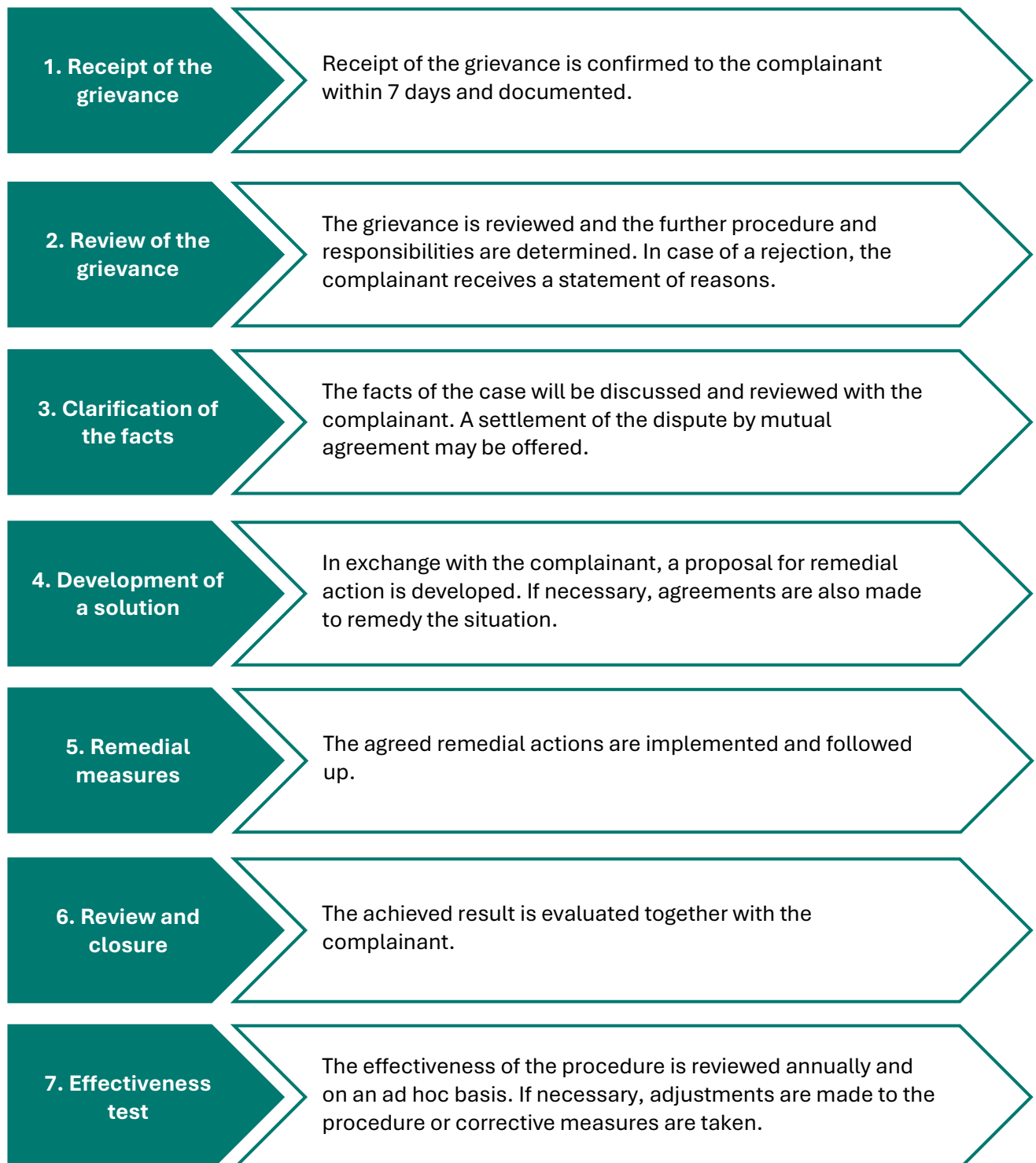
The digital grievance mechanism is continuously available and offers complainants the possibility to submit grievances while maintaining their anonymity. At the same time, questions about the grievance can be answered via a protected mailbox and thus contribute to the clarification of the facts. The digital grievance mechanism is available in a total of six languages (German, English, Spanish, Portuguese, French, Turkish). However, grievances can always be submitted in the national language. The digital grievance mechanism is located on an external platform and is therefore not part of the IT infrastructure of the ENERCON Group. The operator of the platform has no access whatsoever to the contents of the grievance mechanism. It is technically and organisationally ensured that access to the system and the underlying communication are protected and that grievances - if desired - are submitted anonymously.

The ombudsman is bound to secrecy by virtue of his position as a lawyer external to the company under German law. This obligation can only be lifted with the personal consent of the person providing the information. If the complainant chooses this channel, however, he or she is obliged to allow the ombudsman to pass on anonymised case information. The type and content of the disclosure of information will be agreed with the complainant in order to take into account his or her assessment of the risk to anonymity.

The ENERCON Group encourages all complainants to seek a resolution at local level (e.g. with the production site concerned) before filing an official complaint through the grievance mechanism.

3 Procedure of the grievance mechanism

The following figure shows the process of the grievance mechanism. Throughout the entire procedure, there is regular, transparent communication with the person making the complaint about the process and progress. At the latest three months after the grievance has been filed, the complainant will receive feedback on the status of the procedure.



4 Settlement of disputes by mutual agreement

The ENERCON Group reserves the right to offer a settlement of disputes by mutual agreement to complainant. In this case, the parties involved try to find a mutual solution together with the help of a neutral and mediating third party instead of bringing about a decision via the official grievance mechanism. The focus is on solution-oriented cooperation to develop remedial or preventive measures that are supported by all parties. Possible structural power imbalances between the company and the complainant are taken into account. The ENERCON Group strives to balance these as far as possible in the process, for example by involving independent organisations to support the complainant.

There is no right to a settlement of disputes by mutual agreements.

5 Confidentiality of the complainant's identity

Protecting the identity of the complainant is a top priority for the ENERCON Group. All parties involved who receive information in the course of processing reported grievances must treat this information as strictly confidential and are contractually bound to secrecy. Inappropriate disclosure or misuse of confidential information and data is prohibited and may result in consequences under labour law.

Compliance with data protection requirements, in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (GDPR), is guaranteed for the entire ENERCON Group. Both the personal data of the person providing the information and the content of the grievance will only be used within the framework of the legally permissible requirements. Third parties do not have access to this information.

6 Protection of the complainant

No discrimination against employees who make grievances in good faith will be tolerated within the ENERCON Group. It is prohibited in any way to sanction grievances made in good faith. Discrimination against complainants may result in consequences under labour law, including dismissal.

However, abuse of the grievance mechanism will not be tolerated. Thus, no grievances will be accepted that are not made in good faith, such as grievances that contain deliberate misinformation or that are made in bad faith to harm the ENERCON Group, its employees or third parties.

Nevertheless, no one can be guaranteed protection from subsequent criminal prosecution, as official investigations may be initiated for reasons beyond the control of the ENERCON Group.

Outside the ENERCON Group, no discrimination against employees of business partners or other external persons who make grievances in good faith will be tolerated. The ENERCON Group expects its business partners to protect complainants from discrimination. Discrimination against complainants by business partners may result in the termination of the business relationship.

7 Responsibilities within the ENERCON-Group

The grievance mechanism is - equivalent to the whistleblowing system - part of the company-wide compliance management system of the ENERCON Group. The Ethics & Compliance department is responsible for the operational management of the grievance mechanism within the ENERCON Group. If necessary, the Internal Audit department is involved in clarifying the facts.

If, after clarification of the facts, there is a reasonable suspicion of a compliance violation by employees of the ENERCON Group, the Chief Executive Officer of the ENERCON Group will be informed. If, after clarification of the facts, there is a reasonable suspicion of a compliance violation by a business partner, other relevant members of the Executive Board of the ENERCON Group will be informed (e.g. the Chief Operating Officer in the case of a compliance violation by a supplier).

If it is conducive to finding a solution and confidentiality can be maintained, other company departments can be involved in the grievance mechanism.

8 Point of contact

If you have any questions about the Rules of Procedure, please contact the Ethics & Compliance department at compliance@enercon.de.

Appendix 1: Overview of exemplary human rights-related and environment-related breaches of duty

Human rights-related breaches of duty:

- Disregard of the prohibition of child labour
- Disregard of the prohibition of forced labour and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association, freedom to organise and/or the right to collective bargaining
- Disregard of the prohibition of unequal treatment in employment
- Disregard of the prohibition of the withholding of a decent wage
- Destruction of natural resources through environmental pollution
- Unlawful violation of land rights
- Failure to comply with the prohibition against hiring or using private/public security forces that may cause harm due to lack of instruction or control
- Failure to comply with the prohibition of an act or omission in breach of duty which is directly likely to impair in a particularly serious manner a protected legal position (arising from the human rights conventions in Appendix 2) and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances under consideration

Environment-related breaches of duty:

- Prohibited production, use and / or disposal of mercury (Minamata Convention)
- Prohibited production and / or use of substances within the scope of the Stockholm Convention (POPs) as well as non-environmentally sound handling of waste containing POPs
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention

Appendix 2: Conventions

1. International Labour Organization Convention No. 29 of 28 June 1930 concerning Forced or Compulsory Labour (ILO Convention No. 29).
2. Protocol of 11 June 2014 to the International Labour Organization Convention No. 29 of 28 June 1930 concerning Forced or Compulsory Labour
3. International Labour Organization Convention No. 87 of 9 July 1948 concerning Freedom of Association and Protection of the Right to Organise, as amended by the Convention of 26 June 1961 (ILO Convention No. 87)
4. International Labour Organization Convention No. 98 of 1 July 1949 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, as amended by the Convention of 26 June 1961 (ILO Convention No. 98)
5. International Labour Organization Convention No. 100 of 29 June 1951 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (ILO Convention No. 100)
6. International Labour Organization Convention No. 105 of 25 June 1957 concerning the Abolition of Forced Labour (ILO Convention No. 105)
7. International Labour Organization Convention No. 111 of 25 June 1958 concerning Discrimination in Respect of Employment and Occupation (ILO Convention No. 111)
8. International Labour Organization Convention No. 138 of 26 June 1973 concerning the Minimum Age for Admission to Employment (ILO Convention No. 138)
9. International Labour Organization Convention No. 182 of 17 June 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO Convention No. 182)
10. International Covenant of 19 December 1966 on Civil and Political Rights
11. International Covenant of 19 December 1966 on Economic, Social and Cultural Rights
12. Minamata Convention on Mercury of 10 October 2013 (Minamata Convention)
13. Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (POPs Convention), as last amended by the Decision of 6 May 2005

14. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014