

# **RULES OF PROCEDURE**

**FOR THE JUNGHEINRICH GROUP  
COMPLAINTS PROCEDURE**



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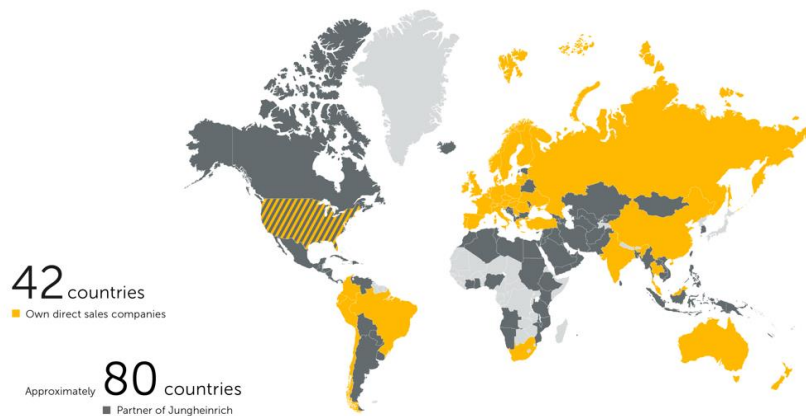
## 1. Foreword

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Jungheinrich does business in many countries around the world with just over 21,000 employees. We are aware of the responsibility that comes with this and want to do justice to it in the sense of "Creating sustainable value - that is our goal at Jungheinrich."

For us, this includes complying with legal requirements in the countries in which we operate and adhering to internal Jungheinrich rules that apply to the Group.

This also includes respect for human rights with regard to our own employees and in our supply chains, as well as respect for the environment in the context of our business activities throughout the Group.



We therefore consider whistleblowers and their reports<sup>1</sup> to be valuable, as they help us to uncover possible violations of applicable rules and possible abuses against people and the environment in our own business area or in our supply chains as early as possible. Based on this, we want to take remedial action and initiate preventive measures.

This description of our complaints procedure, which is publicly available, describes the legal bases applied, contact persons, reporting channels offered, the process for handling complaints and the principles that guide us in handling complaints.



**And so, we would like to encourage all whistleblowers to use the Jungheinrich complaints procedure described here!**

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<sup>1</sup> We use the terms "information" and "report" synonymously in these Rules of Procedure.



## 2. Legal bases

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We fulfil our obligations under the German Whistleblower Protection Act (HinSchG) and the German Supply Chain Due Diligence Act (LkSG) with regard to the design of our reporting options and structures.

Persons who wish to submit information to the Jungheinrich OpenLine or directly by telephone or e-mail to our Group Reporting Office within the framework of these rules of procedure are granted whistleblower protection in accordance with the HinSchG. This means that these persons are protected after reporting violations of applicable law in the following areas:

- Criminal offences, in particular, but not exclusively, in the areas of corruption, competition law, fraud and breach of trust, violation of legally protected secrets, criminal manipulation, money laundering or misuse of data.
- Criminal offences and administrative offences in the areas of environmental protection and occupational safety.
- Attempted and preparatory acts for criminal offences.
- Administrative offences subject to fines, insofar as the violated regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies.
- Violations of labour law regulations that may justify termination without notice for good cause, in particular violations of the General Equal Treatment Act (AGG), (sexual) harassment and bullying.

Within the framework of the Supply Chain Due Diligence Act (LkSG), the complaints procedure enables persons to report human rights and environmental risks as well as violations of human rights and environmental obligations that have arisen due to the economic activities of Jungheinrich or one of our suppliers. A violation of a protected legal position or human rights and environmental obligations is any behaviour that violates one of the prohibitions listed in Section 2 (2) and (3) LkSG, i.e., in particular.

- Prohibition of child labour, prohibition of forced labour and slavery, prohibition of discrimination and harassment, prohibition of freedom of association, freedom of association and the right to collective bargaining, disregard of applicable occupational health and safety regulations, disregard of working time requirements, withholding of an appropriate wage, unlawful forced evictions, deprivation of livelihoods due to environmental pollution or the use

of private/public security services that lead to impairments due to a lack of instruction or control;

- Environmental breaches of duty, e.g., in the handling and disposal of hazardous waste or the production or use of banned chemicals and substances such as mercury and persistent organic pollutants (POPs).

In addition, the reporting channels are also open for information on possible irregularities with regard to compliance with Jungheinrich's internal rules.



### 3. Group Reporting Office at Jungheinrich

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The person responsible for organising the existing reporting channels and managing the clarification of all incoming reports at Group level is the Vice President Corporate Legal Affairs, Compliance & Insurances based at the Group headquarters in Hamburg (hereinafter referred to as the **Head of the Group Reporting Office**).

He is supported in his area of responsibility by qualified employees who report directly to him.

For information on how to contact the Head of the Group Reporting Office or his employees, please refer to [Chap. 6.1 Which reporting channels do we offer?](#)

Dr Nicolai Nahrgang  
Vice President Corporate Legal Affairs, Compliance & Insurances  
Friedrich-Ebert-Damm 129  
22047 Hamburg

We would like to ask that simple requests for information or deletion be addressed directly to the **Group Data Protection Officer at Jungheinrich**, as they are not information within the meaning of these Rules of Procedure.

In addition to simple requests for information and deletion, it is also possible to contact the Group Data Protection Officer directly with information or complaints with the threat of consequences under data protection law (e.g., reporting to a data protection supervisory authority).

For his contact details as well as further information on the subject of data protection and our privacy policy via see this link here: [Privacy Policy \(jungheinrich.de\)](#).



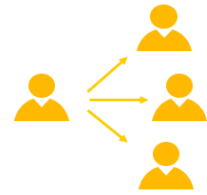
## 4. Who can use the Jungheinrich reporting channels?

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Reports can be provided by all Jungheinrich employees, but also by any external third party such as our customers, shareholders, employees of suppliers and other business partners, job applicants in Germany and abroad or Jungheinrich employees throughout the Group.

Persons who are not directly affected by risks or violations also have the opportunity to submit information on risks and breaches of duty via the complaints procedure. If a report is to be submitted on behalf of a person who may be affected, we may ask to submit a power of attorney from this person.

However, the complaints procedure is not to be used to report incidents that relate exclusively to the private or intimate sphere of our employees, nor to report obviously minor and legally unobjectionable inconveniences (e.g. deviation from the canteen menu, short-term defect in the coffee machine, inadvertent failure to greet colleagues, etc.).



## 5. Who processes incoming reports?

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Upon receipt of the report, the Head of the Group Reporting Office evaluates the details of the case and decides on the further clarification of the report.

Depending on the content of the report, further processing is then carried out by qualified **employees of the Group Reporting Office**, by carefully selected internal contacts at Jungheinrich such as the **Human Rights Officer** at Jungheinrich, **employees of the Group Internal Audit department**, by **local Compliance Officers**, the **Group Data Protection Officer** at Jungheinrich or, in individual cases, with the involvement of third parties such as law firms.

If the Group Reporting Office receives information relating to a Jungheinrich organisational unit abroad, the following must first be assessed in the Group Reporting Office:

- Is the entity obliged under local law to carry out the investigation itself?
- Is the examination permitted under local law?
- Could there be conflicts of interest?

Local data protection law and local labour law regulations must be complied with and, if necessary, the involvement of the local works council must be taken into account.

If the report is then processed locally, the designated local compliance officer usually takes over the processing and ensures the proper procedure in accordance with the local applicable requirements and with regard to Jungheinrich's requirements for report processing.





## 6. Which reporting channels do we offer?

Whistleblowers can contact the Group Reporting Office directly or - if desired - anonymously via the Jungheinrich OpenLine (portal + telephone).

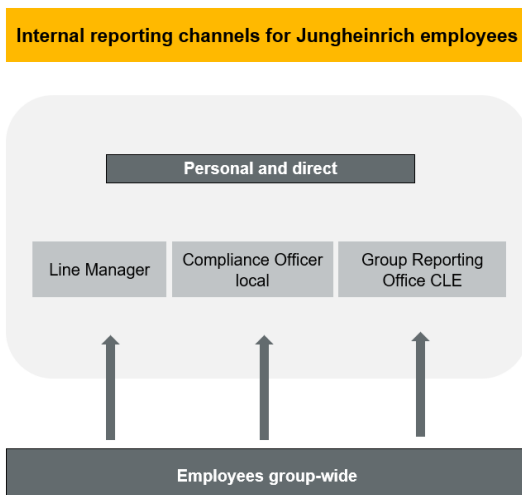
### 6.1 Direct personal contact

#### **Jungheinrich** employees

Employees are encouraged to contact their direct manager in the event of any doubts or indications.

At the same time, there are designated compliance officers on site for each Jungheinrich location, who can also be contacted confidentially by employees there.

If employees deem it necessary, the head of the Group Reporting Office or his employees can also be contacted directly internally.



#### **External** whistleblowers

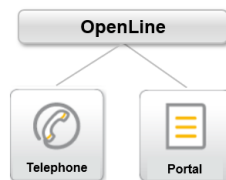
External third parties can contact the Group Reporting Office and request a personal meeting via the following e-mail address. Only the head of the Group Reporting Office and his direct employees have access to this e-mail address:

**JH-Compliance@jungheinrich.de**

### 6.2 Anonymous Jungheinrich OpenLine Telephone + Portal

If employees or external third parties prefer a completely anonymous reporting channel, the Jungheinrich OpenLine is available to them.

Contact can be made either by telephone or via an external electronic portal.



#### 6.2.1 OpenLine telephone

Whistleblowers can use the OpenLine telephone worldwide and free of charge if they wish to call us at the Group Reporting Office anonymously.

Availability via mobile phone depends on the mobile phone provider of the whistleblower. Freephone numbers with the dialling code 00 800 **cannot be reached** via individual providers. **If this is the case, please call the OpenLine telephone via landline.**

Please find an overview of the OpenLine telephone numbers here:

Country	Telephone Numbers
Argentina	coming soon
Australia	00 800 6736 5463
Austria	00 800 6736 5463
Belarus	00 800 6736 5463
Belgium	00 800 6736 5463
Brazil	00 800 6736 5463
Bulgaria	00 800 6736 5463

Country	Telephone Numbers
Chile	0056800914270
China	coming soon
Croatia	00 800 6736 5463
Cyprus	00 800 6736 5463
Czech Republic	00 800 6736 5463
Denmark	00 800 6736 5463
Estonia	coming soon
Finland	00 800 6736 5463
France	00 800 6736 5463
Germany	00 800 6736 5463
Greece	00 800 6736 5463
Hong Kong	00 800 6736 5463
Hungary	00 800 6736 5463
Iceland	coming soon
India	00918000509089
Ireland	currently not available
Israel	00 800 6736 5463
Italy	00 800 6736 5463
Japan	00 800 6736 5463
Kyrgyzstan	currently not available
Korea (South)	00 800 6736 5463
Latvia	coming soon
Lithuania	00 800 6736 5463
Luxemburg	00 800 6736 5463
Malaysia	00 800 6736 5463
Malta	coming soon
Moldova	currently not available
Netherlands	00 800 6736 5463
New Zealand	00 800 6736 5463
Norway	currently not available
Philippines	coming soon
Poland	00 800 6736 5463
Portugal	00 800 6736 5463
Romania	coming soon
Russia	currently not available
Singapore	00 800 6736 5463
Slovakia	00 800 6736 5463
Slovenia	00 800 6736 5463
Spain	00 800 6736 5463

Country	Telephone Numbers
Netherlands	00 800 6736 5463
New Zealand	00 800 6736 5463
Norway	currently not available
Philippines	coming soon
Poland	00 800 6736 5463
Portugal	00 800 6736 5463
Romania	coming soon
Russia	currently not available
Singapore	00 800 6736 5463
Slovakia	00 800 6736 5463
Slovenia	00 800 6736 5463
Spain	00 800 6736 5463
South Africa	00 800 6736 5463
Sweden	coming soon
Switzerland	00 800 6736 5463
Taiwan	00 800 6736 5463
Thailand	coming soon
Turkey	currently not available
Ukraine	00 800 6736 5463
United Kingdom	00 800 6736 5463
United Arab Emirates	coming soon
Uruguay	00 800 6736 5463
USA	00 800 6736 5463
Uzbekistan	currently not available

The head of the Group Reporting Office takes calls from people who wish to make contact via the OpenLine telephone during our office hours from **Monday to Friday from 9.00 a.m. to 5.00 p.m. (CET)**. If he is not available, calls will be forwarded to the responsible employees within the Group Reporting Office.

If whistleblowers wish to **make contact** in her or his native **language**, or if they can only contact **us outside our office hours**, we recommend leaving a voicemail message with a telephone number so that we can contact this person as soon as possible.

We would like to point out that callers are even better protected if they call the OpenLine telephone from a telephone outside the Jungheinrich telephone system, as the calling person's telephone number is then technically suppressed.

### 6.2.2 OpenLine Portal

The OpenLine can be used anonymously or non-anonymously. If whistleblowers do not state their name in their reports via the OpenLine portal, they will remain anonymous throughout the entire process.

Reports filed via the electronic OpenLine portal are stored in a password-protected and encrypted form on specially secured servers of audimex GmbH, based in Germany. Access to incoming reports is only permitted and possible for the Head of the Group Reporting Office or authorised employees in the Group Reporting Office.

The safest way to access the Jungheinrich OpenLine Portal is to copy the following **URL** and then open it via the *browser* of any computer outside the Jungheinrich systems:

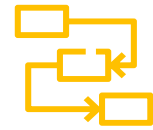
**<http://www.whistle-blow.org/JungheinrichAG>**

Otherwise, reporting persons can reach the Jungheinrich OpenLine directly via this link:

**[Whistleblow-org Jungheinrich](#)**

As of March 2024, anyone wishing to contact us can do so via the following language versions of the OpenLine portal German, English, French, Spanish, Greek, Czech, Hungarian, Polish. We will add additional languages in accordance with legal or operational requirements.

Our internal working languages are **German** and **English**. However, we will return answers and results to the reporting person in his or her national language if this is required or desired.



## 7. How do we process incoming reports?

### 7.1 Receipt and confirmation of registration

If the Group Reporting Office receives a notification, the person who has contacted us will receive confirmation of receipt of the report **within seven days**.

Whistleblowers will receive this confirmation - as far as technically possible - via the channel they used to contact us, i.e., via the OpenLine telephone or in writing by e-mail if they have contacted the Group Reporting Office.

In case a report is to be submitted via the OpenLine portal, reporting persons must memorise the **sixteen-digit access code** that is generated on submission of the report; this code will allow them to access their case later on and to read any information by us on their case. We are not able to reconstruct the access code technically (see illustration below).

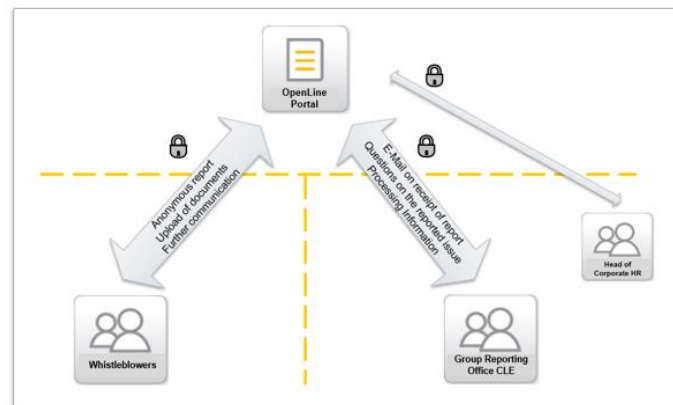


**PLEASE NOTE**

- ▶ For this communication to work, you will need the **sixteen-digit access code** you receive when you send your initial report.
- ▶ It is essential that you **remember this code**, as it enables you to **view your case** via the **OpenLine entry page** later on.
- ▶ To protect your anonymity, this **access code cannot be recovered** by our provider, and it is unknown to us.

Furthermore, if whistleblowers use the OpenLine portal for reporting, they specify whether the report goes against the Head of the Group Reporting Office or his employees.

In this case, the report is forwarded directly to the Jungheinrich Group Head of Human Resources as an independent recipient at Jungheinrich and processed there. This helps to avoid potential conflicts of interest and to clarify incoming reports as fairly and independently as possible (see illustration below).



## 7.2 Content of a notice

The following information in the report will help us to clarify it in a well-founded and results-orientated manner; however, this is not mandatory:

- What has happened?
- When did the incident occur or is it still ongoing?
- Where did it happen?
- Who are the persons or groups of persons concerned?
- Who or what could be the cause of the grievance and which rules (internal or external) could have been violated?
- What damage could arise or have arisen?
- Are there any supporting documents (e.g., photos, documents)? If available, they can be uploaded via the OpenLine portal.
- Are there any witnesses?
- What remedial/preventive measures are considered useful or necessary?
- How can we as the Group Reporting Office communicate with the whistleblower (via the OpenLine portal, by e-mail / telephone contact or as part of a personal appointment)?

## 7.3 Processing of the information received

The Head of the Group Reporting Office or his staff carry out an initial plausibility check and coordinate further audit procedures on this basis.

As a rule, the facts of the case are discussed with the whistleblower to be able to process the report carefully if it is technically possible to make contact.

Depending on the subject area concerned, the report will then either be clarified by the employees of the Group Reporting Office themselves or it will be forwarded confidentially to selected internal contacts in other specialist departments / organisational units at Jungheinrich. In the case of reports relating to the Supply Chain Act, for example, these may also be neighbouring departments such as Sustainability, Purchasing, Human Resources or Occupational Health & Safety.

Compliance reports must be recorded, processed, documented and reported in accordance with legal and/or internal deadlines and in compliance with corresponding internal guidelines.

#### **7.4 Documentation**

The Group Reporting Office ensures the confidential handling, i.e., the recording, processing and documentation of reports via closed IT systems. Only defined and trained employees have access here.

#### **7.5 Conclusion and follow-up measures**

Notifications received must be processed and, if possible, finalised within the specified deadlines.

Case processing is completed as soon as:

- the person responsible for processing the report has, to the best of his or her knowledge and belief, fully recorded and clarified the facts mentioned.
- follow-up measures or measures to avoid similar problems in the future have been defined.
- the report and its processing, including all supporting documents, have been documented and the Head of the Group Reporting Office has authorised the completion of the investigation.

Depending on the severity of the matter, possible follow-up measures or possible preventive or remedial measures include, for example, the following:

- Follow-up measures such as further discussions with persons involved, initiation of further comprehensive investigative measures, involvement of law enforcement or supervisory authorities.
- Preventive or remedial measures such as: written warning, transfer, cancellation, termination of business relationships with business partners such as suppliers, additional training measures.



### **7.6 Feedback to the whistleblower**

Whistleblowers will receive feedback on the processing status of their report within **three months at the latest**, whereby we recognise the need to process reports received as quickly as possible.

In individual cases, this depends on the complexity of the case. And we would also like to give the person providing the report or the persons named in the report the opportunity to comment on the facts.

If the reported case is very complex, the investigation may take longer than three months. We will inform the whistleblower of this in good time if we are able to contact him or her.



## 8. What principles apply to our process?

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### 8.1 Protection against adverse effects on the whistleblower

Whistleblowers can report substantiated violations and then enjoy corresponding protection.

Justified violations are deemed to exist if there are indications or concrete circumstances suggesting a violation of external or internal rules and if the person had sufficient reason to believe that the information provided was correct at the time the report was submitted, i.e., the person submitted the report to the best of his or her knowledge and belief.

Jungheinrich shall ensure that these persons are protected from direct or indirect retaliation of any kind, such as dismissal, suspension, warning, transfer, reassignment, demotion, or other discriminatory actions against them. The threat of negative consequences is also prohibited.

If retaliation occurs during the processing of the report or even after the report has been processed, whistleblowers should contact the Group Reporting Office again directly, as retaliation will not be tolerated.

### 8.2 Dealing with deliberately false information

Deliberately false or defamatory statements in a report can have far-reaching consequences for the person concerned. The injured party is then entitled to compensation.

If it subsequently transpires that allegations were deliberately false or misleading, the identity of the reporting party may be disclosed, and whistleblowers may face consequences.

### 8.3 Fair and independent processing of all reports

Jungheinrich ensures the independence of the Group Reporting Office in organisational terms as an independent staff unit with a direct reporting line to the responsible member of the Board of Management and CEO, Dr Lars Brzoska.

Jungheinrich's internal guidelines apply to the investigation of reports. This means, for example, that the information is investigated as neutrally and objectively as possible. To this end, all aspects are examined, including those that may exonerate

the accused person. Persons who are named in a report have the right to comment on any allegations made therein.

In addition, possible conflicts of interest in relation to the clarification of the information or the persons commissioned with the clarification must be excluded.

#### **8.4 Data protection**

For the OpenLine portal, whistle-blowers can find the relevant information on data protection directly on the OpenLine portal page here: [whistle-blow.org Jungheinrich - Privacy Policy](https://whistle-blow.org/Jungheinrich-Privacy-Policy).

The processing of reports by the persons involved, i.e. the Head of the Group Reporting Office, his employees or, if applicable, persons from other departments involved in the processing of reports, is carried out in accordance with the GDPR and, in particular, in compliance with the required confidentiality in accordance with Section 8.6 of these Rules of Procedure (including restrictive disclosure of information obtained only to employees defined and trained in advance as part of the whistleblower system).

Persons responsible for a report must document all incoming reports in a permanently retrievable manner in compliance with the confidentiality requirement.

If the report is made by telephone / other type of voice investigation, the conversation may only be recorded with the consent of the person making the report.

Reports and their associated documentation will be retained for as long as they are required for clarification and subsequent assessment, or if Jungheinrich has a legitimate interest in retaining them or if there is a legal requirement to retain them.

#### **8.5 Duty of confidentiality**

Not all reports or disclosures can be protected under the HinSchG. Security interests as well as confidentiality and secrecy obligations take precedence (e.g. lawyers, notaries, doctors, pharmacists): Lawyers, notaries, doctors, pharmacists). However, there are cases in which, despite confidentiality and secrecy obligations, there is corresponding protection under the German Whistleblower Protection Act (HinSchG). It must be assumed that the report is necessary in order to uncover an offence. Affected persons are e.g: Persons who have obtained business secrets / confidential information in a professional context.

## 8.6 Confidentiality

The Group Reporting Office ensures the confidential handling of incoming reports via closed IT systems for receiving reports and subsequent case processing and documentation. Only defined and trained employees have access here.

Employees of the Group Reporting Office or other persons at Jungheinrich who are involved in the case clarification are subject to a duty of confidentiality and have been instructed accordingly. In addition, information obtained as part of the case investigation may only be passed on restrictively in accordance with internal guidelines.

Information about the identity of the whistleblower may only be disclosed in absolutely exceptional cases. Disclosure is possible, for example,

- in criminal proceedings at the request of the criminal prosecution authorities,
- in criminal proceedings at the request of the criminal prosecution authorities,
- on the basis of an order in an administrative procedure following a notification, including administrative fine proceedings,
- on the basis of a court decision,
- or if the disclosure is necessary for follow-up measures and the person providing the information has consented to the disclosure.

## 8.7 Participation rights of employee representatives

If it emerges during the processing of the report that the relevant works council has participation rights, it will be involved accordingly.

## 8.8 Assumption of costs as part of the complaints procedure

Any person providing information can make use of the described procedure free of charge.

## 8.9 Contact possibility with official reporting centres

Employees are free to contact the internal Group reporting Office or an external<sup>2</sup> reporting office.

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<sup>2</sup> External reporting centres are e.g:

- **Federal Office of Justice**, Adenauerallee 9-103, 53113 Bonn (see [website](#));
- **Federal Financial Supervisory Authority** (BaFin), Whistleblower Reporting Centre, Graurheindorfer Straße 108, 53117 Bonn (see [website](#));
- **Bundeskartellamt**, Kaiser-Friedrich-Straße 16, 53113 Bonn (see [website](#)).

However, Jungheinrich generally encourages all employees and external third parties to first contact the internal contact persons at Jungheinrich with their reports or to use the Jungheinrich reporting channels offered.

This gives us the opportunity to follow up the report as effectively and appropriately as possible. If an internally reported violation has not been remedied, the person providing the information is at liberty to contact an external reporting centre.

## **9. Review of effectiveness**

We review the effectiveness of the complaints procedure at least once a year and on an ad hoc basis.