

Procedural Rules

for the

Grievance Procedure

according to the German Act on Corporate Due Diligence Obligations in Supply Chains

(December 2023)

Under the German Act on Corporate Due Diligence Obligations in Supply Chains ("Supply Chain Due Diligence Act" or "SCDDA"), Leica Camera AG is obliged to comply with appropriate human rights and environmental due diligence obligations in its supply chains and in its own business operations.

According to Section 8 SCDDA, a grievance procedure must be established. The procedure enables employees and external third persons to take receipt of relevant indications and complaints indicating human rights risks or environmental risks and/or corresponding breaches of duty, and to investigate the same.

This Grievance Procedure provides inter alia information on the types of information and complaints which can be handed in, the available grievance channels, the course of the procedure and the protection of the whistleblowers.

1. For what kind of information and complaints can the procedure be used?

In the grievance procedure according to the SCDDA, information and complaints can be reported on the risks and breaches of duty listed below, which could have arisen from the economic actions of Leica Camera AG in the own business operations or those of a direct or indirect supplier.

Human rights risks and breaches of duty in particular include:

- Child labour
- Forced labour and any kind of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard of freedom of assembly, freedom of association and the right to collective bargaining
- Unequal treatment in employment
- Withholding of appropriate wages
- Destruction of the natural basis of life through environmental pollution
- Unlawful violation of land rights
- Engagement or use of private/public security forces that may cause harm due to lack of training or control
- Other behaviour that seriously impairs protected legal positions.

Environmental risks and breaches of duty in particular include:

Failure to comply with the prohibitions on environmental protection by violating one of the following regulations:

- Minamata Convention, e.g. by discharging wastewater containing mercury into water bodies.
- Stockholm Convention/POP Convention, e.g. improper handling of chemicals that are highly toxic and persistent (e.g. pesticides).
- Basel Convention, e.g. improper disposal of heavily contaminated plastics.

2. Through what grievance channels can information and complaints be brought into the procedure?

The central channel for information and complaints according to the SCDDA is a web-based software, a so-called digital grievance system. It is available online via the following link and can be used by whistleblowers free of charge: [grievance system](#)

Alternatively, the whistleblowers can report their information via the following hotline [from Germany: +49 800 3800 999 from other countries: +49 69 99998839]. The hotline is available from Monday through Friday from 9:00 to 17:00 o'clock in German and English, and is staffed with trained employees of the provider of our digital grievance system. The employees receive the information and enter it in the form of a content report into the digital grievance system for further processing.

Information on the existing grievance channels is available on the Leica Camera AG Homepage. Employees of Leica Camera AG are additionally informed via the Intranet.

3. How does the grievance procedure work?

Information and complaints can be submitted in anonymised or non-anonymised form to the digital grievance system or via the Hotline specified above. The whistleblowers receive a confirmation of receipt within about seven days via e-mail, or in the event of an anonymised report a confirmation in the digital grievance system. An access code generated by the system and a personally assigned PIN make it possible to view the ongoing procedure at any time. Furthermore, it is possible to ask questions to the whistleblower via the chat function, which the whistleblowers see as soon as they again log in.

All incoming information is processed in consideration of the applicable data protection regulations.

3.1 The ombudspersons and their tasks

Incoming information is first received and checked within the scope of an initial assessment by one or several external ombudspersons who are subject to professional secrecy and who can prove the

corresponding professional qualification ("Ombudspersons"). In this context it is also examined which affiliate or which supplier is concerned by the report.

The Ombudspersons clarify - if necessary in cooperation with the whistleblower - the facts in a further step, based on the submitted information, in order to determine whether a violation of human rights and/or environmental obligations seems possible.

If the result of this initial assessment shows that such violation of obligations is excluded, the procedure is ended and the whistleblower correspondingly informed.

If within the scope of the initial assessment the Ombudspersons arrive at the result that a concrete violation of human rights and/or environmental obligations seems possible or such risk cannot be excluded, the information available to the Ombudspersons will be forwarded to the Compliance Office of Leica Camera AG for further clarification and processing.

3.2 Internal processing by the Compliance Office and further internal bodies

If within the scope of further processing a concrete risk for a violation of any obligation relating to human rights or the environment is identified in the own business operations, or if such violation does already exist, adequate remedial measures will be taken without undue delay with the involvement of the corresponding internal departments in order to prevent or end such violation or to minimise the scope of the violation, and to prevent a repeated occurrence.

If the information or the complaint relates to a direct supplier, that supplier will be contacted. If within the further course of the investigations the suspicion of a violation is confirmed, a concept for ending or minimising the violation will be prepared and implemented. The same procedure applies in the case of information on violations at an indirect supplier.

The whistleblowers are contacted by the Compliance Office if further questions arise, and are informed about the processing of the information and the result of the investigation. The duration of the procedure can vary depending on the scope and complexity of the complaint.

4. How is the effective protection of anonymity and against discrimination or punishment due to a complaint guaranteed?

The following measures serve to protect the whistleblowers:

- Anonymous reports: Whistleblowers can submit an anonymous report and also communicate with the Ombudspersons via the digital grievance system while maintaining their anonymity. Only in the event of an express consent by the whistleblower or in the case of a legally standardised exceptional case can the identity of the whistleblower be disclosed.

- Confidentiality: All information enabling conclusions about the identity of the whistleblower are treated confidentially. This also applies to the phase after the completion of the procedure. In addition, there is a determined access and authorisation concept for the data in the grievance system.
- Protection against discrimination or punishment: The protection of whistleblowers against discrimination or punishment is an important component of the grievance procedure. If despite all measures taken above the whistleblowers have the impression that they suffer intimidation or repressions due to their report, they can contact the grievance office to have that also examined.
- To the extent that whistleblowers are affected who are employees of the direct supplier, the company will endeavour to make corresponding protective arrangements with the supplier. Own employees are protected by an agreement in the internal Works Agreement, according to which whistleblowers must not be personally or legally discriminated due to the notification of a grievance relevant according to the SCDDA. Likewise, reports against employees that turned out to be without substance will not result in any personal or legal discrimination of the wrongfully reported person.

5. Effectiveness of the grievance procedure and documentation

This procedure is at least once a year or on an ad-hoc basis checked for effectiveness and adequateness. If necessary, the procedure or remedial and preventive measures taken are adjusted. All information and complaints are documented according to the statutory regulations and stored for seven years.

6. Costs of the procedure

This procedure is free of costs for the whistleblower.