



German Supply Chain Due Diligence Act
Caverion Complaints and Notification
Procedure

Content

1	Does Caverion have a company-wide procedure?.....	1
2	Who can submit complaints and notifications?.....	1
3	Are there any costs for reporting persons?	1
4	What can I report?.....	1
5	Do I have various options for submitting complaints or notifications?	2
6	Who will deal with my complaint or notification?	2
7	Will my identity be treated confidentially?	3
8	Will I be notified that my complaint or notification is being processed?.....	3
9	Are all complaints and notifications processed?	3
10	What happens to my complaint or notification once it has been reviewed?.....	3
11	Are there any guidelines for fact finding?.....	4
12	Am I protected as the reporting person?	4

Foreword

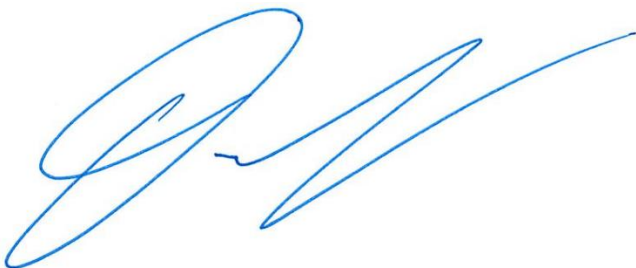
Since 1 January 2024, Caverion Deutschland GmbH ("Caverion") has been obliged to implement the provisions of the German Supply Chain Due Diligence Act (LkSG). The LkSG obliges Caverion to take due diligence measures to ensure that its own business activities and those of the supply chain are conducted responsibly regarding human rights and environmental concerns.

Why do we at Caverion publish a complaints and notification procedure and how does it work?

The LkSG imposes certain requirements in connection with the complaint's procedure. It obliges Caverion to offer potentially affected persons inside and outside the company effective and accessible opportunities to submit their complaints. All complaints and notifications must be handled in a fair and transparent manner. The LkSG is not limited to Caverion's business activities in Germany but applies to us and the company's suppliers worldwide. Caverion is also obliged under the LkSG to make the complaints and notification procedure publicly available.

We explain exactly how the complaints and notification process works on the following pages as part of these procedure.

Munich, 17 October 2024



Robert Dalla-Via

Human Rights Officer Caverion Germany

1 Does Caverion have a company-wide procedure?

Yes. Caverion operates a company-wide, transparent, public and easily accessible standardized complaints and notification procedure.

All complaints and notifications from employees or third parties are treated equally - insofar as this is permitted by law.

2 Who can submit complaints and notifications?

Everyone. The complaints and notifications procedure is accessible to everyone. Employees as well as

individuals and organizations outside Caverion can report complaints and notifications.

3 Are there any costs for reporting persons?

No. The complaints and notification procedure is accessible free of charge to anyone inside or outside the

organization.

4 What can I report?

Any suspicion of an actual or potential violation of laws or internal regulations - in particular with regard to human rights and environmental risks or obligations that fall within the scope of protection of the Supply Chain Due Diligence Act (LkSG). Details on the special scope of protection of the LkSG can be found in § 2

LkSG: The suspicion can either be directed against individual Caverion employees or exist in connection with a Caverion business or a supplier. Please only submit complaints or notifications if you are convinced that they are correct.

5 Do I have various options for submitting complaints or notifications?

Yes. Caverion offers various reporting channels that you can use for complaints or notifications.

[Whistleblower Software](#) is a tool where you can submit complaints or notifications 24 hours a day, seven days a week. You can also submit a report anonymously if you do not wish to give your name. Of course, the reporting procedure is free of charge.

[Whistleblower Software](#) is available in several languages and is maintained by an independent provider. The data is stored on protected servers. The content of the reports is processed exclusively by Caverion.

Of course you can also contact us directly by e-mail: ethics@caverion.com

For complaints specifically from the area of the LkSG: menschenrechtsbeauftragter@caverion.com

If you would prefer to contact us by post, please write directly to our Human Rights Officer, Mr Robert Dalla-Via:

Caverion Deutschland GmbH
Robert Dalla-Via -personally-
Gstocketwiesenstraße 9
94469 Deggendorf
Germany

6 Who will deal with my complaint or notification?

Your complaint or notification will be processed internally by Caverion.

The Legal & Compliance department receives all complaints and notifications. In addition, all complaints and notifications in connection with the German Supply Chain Due Diligence Act (LkSG) are sent in parallel to the Caverion Human Rights Officer. The processors are impartial, independent and subject to a special confidentiality obligation. Depending on the type of complaint or notification, further experts will be consulted for further processing.

The company will contact you to clarify any unresolved issues. We will discuss your complaint with you to the extent provided for by the German Supply Chain Due Diligence Act. Of course, this is only possible if we can contact you.

7 Will my identity be treated confidentially?

Yes. All complaints and notifications will of course be treated confidentially and can also be submitted without giving your name. It is particularly important for Caverion

to treat your concerns confidentially and we will protect you as the reporting person. Confidential data may only be passed on if this is necessary and legally permissible.

8 Will I be notified that my complaint or notification is being processed?

Yes. As soon as Caverion receives your complaint or notification, but latest after seven days, you will receive a

confirmation of receipt from Caverion.

9 Are all complaints and notifications processed?

Yes. We take every complaint and notification that reaches us seriously. The Legal & Compliance department and the Human Rights Officer for all LkSG-relevant matters check whether the complaint or

notification contains sufficient information to carry out a further investigation. If we require further information, we will contact you as far as possible.

10 What happens to my complaint or notification once it has been reviewed?

Once the complaint or notification has been reviewed and the need for an investigation has been confirmed, an appropriate procedure is initiated in accordance with our internal investigations policy. During the investigation, all relevant documents are reviewed, witnesses and affected parties are spoken to and, if necessary, electronic data will be analyzed. If necessary, specialized experts may be consulted and, in special cases, the relevant authorities may be informed. At the end of the investigation, the results are summarized in a report.

The possible results of the investigation include recommendations for disciplinary measures (such as dismissal, warnings, transfers) or other remedial measures, for example in risk management or other processes. In the event of suspected cases in the supply chain, preventive or corrective measures can be initiated.

Where possible and legally permissible, we will inform you of the measures taken within three months - even if the investigation has not been completed by then.

11 Are there any guidelines for fact finding?

Yes. All processors must adhere to the internal investigations policy and comply with certain rules of conduct. These include among others the following requirements:

- The reporting person must be protected. Neither the name nor details from the report may be disclosed without good reason.
- Any clarification of facts must be fair, objective, without prejudice and with respect.
- The persons affected by the complaint or notification have the right to be heard.
- Data and information must be treated confidentially.
- As soon as a processor realizes that it is difficult to conduct the investigation objectively for personal reasons, this conflict of interest must be reported. In such cases, the investigation is transferred to other processors without a conflict of interest.

12 Am I protected as the reporting person?

Yes. Caverion does not tolerate retaliation of any kind. Individuals who file complaints or notifications in good faith will not be penalized for doing so. If you believe that you or another person has been retaliated against or that you or another person has been penalized in any way for

filing a complaint, please notify Caverion immediately through one of the Company's reporting channels (preferably [Whistleblower Software](#)). We will investigate all plausible allegations of unfavorable treatment or discrimination.