

# **Procedure Code of the Internal Information System of LAPP**

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## **1. The Internal Information System Procedure Code of LAPP**

### **What is an Internal Information System?**

For LAPP, compliance, integrity, and lawful behavior are the highest priorities. It is essential to detect risks early and proactively avoid them. Therefore, an Internal Information System (hereinafter referred to as 'IIS') is a key tool for reporting and investigating risks and misconduct. LAPP's IIS enables the identification of potential risks and misconduct within LAPP, its business partners, and related companies. It facilitates providing information when, in a professional context, there is data or founded suspicion of actual or potential misconduct. This allows for objective examination of violations and the implementation of appropriate actions as quickly as possible, both in the specific case and to prevent future occurrences.

Thus, the informant must act in good faith, believing the information to be true. If the report reveals a trade secret, the informant must have reasonable grounds to believe that such disclosure is necessary to expose the misconduct. Reports received are systematically investigated, and appropriate follow-up actions are taken if required.

#### **a) Risks and misconduct within LAPP**

Reporting risks and misconduct within LAPP helps prevent losses. Violations of regulations harm the company, and individual misconduct affects all employees. Compliance and integrity are the foundation of LAPP's good reputation and the trust of our business partners. Compliance with rules also impacts the well-being of our staff and, therefore, the long-term economic success of our company. To counteract and prevent such damages as early as possible, we rely on your willingness to report possible irregularities or misconduct if there are tangible and well-founded suspicions.

#### **b) Risks and misconduct by business partners and companies related to LAPP**

We expect integrity not only from all our employees but also from our business partners. At LAPP, we aim to achieve our financial, social, and environmental objectives equally and in sync. To fulfill this global responsibility in our business relationships, we implement various measures for our suppliers. However, in the case of risks or misconduct by our business partners or companies otherwise related to LAPP, particularly — but not exclusively — concerning violations of sustainability regulations, we need to be informed. Our Internal Information System is prepared for this purpose.

## **What is a procedure code?**

This Procedure Code comprehensively outlines information related to reporting communications or information via LAPP's IIS. It details how to submit a report, the phases of the activated procedure, the protection measures for informants, subsequent steps, and the timeframe for receiving information or responses. LAPP has had an IIS in place for several years, and this Procedure Code aims to complement that system, providing greater transparency. It also seeks to encourage active contributions from informants and those assisting them in submitting reports, supporting LAPP, and ensuring compliance.

## **Since when has our procedure code been in effect?**

The procedure code for LAPP's IIS is effective immediately. To keep it up to date, it is reviewed at least once a year and revised if necessary.

## **2. Our Procedure Code**

### **What types of reports can the procedure be used for?**

The IIS can be used to report regulatory violations (including laws related to due diligence in the supply chain), criminal offenses, serious or very serious administrative infringements, and breaches of voluntary commitments, internal company regulations, and policies, particularly in the following areas:

- Accounting, auditing, and internal financial controls
- Corporate integrity
- Environment, health, and safety
- Human resources, diversity, and workplace respect
- Misuse/misappropriation of assets or services
- Others

You will receive detailed information about each topic during the reporting process.

The IIS is not intended for comments or complaints about LAPP products or services or those of our business partners. If you are dissatisfied with services or products, please contact our customer service team or your direct point of contact.

### **Who could be affected by reports submitted via the Internal Information System?**

A report through the IIS can relate to LAPP's business units, as well as business partners (e.g., direct and indirect suppliers) or other third parties.

Reports can refer to:

- Violations committed by LAPP employees during their professional activities
- Violations committed by business partners (e.g., suppliers) of LAPP

### **Through which internal channels can reports or information be submitted?**

LAPP's IIS offers several internal channels for reporting potential irregularities and regulatory violations:

#### **1. Online Reporting System (Digital Channel)**

The Internal Information System includes an online or digital communication channel for reporting potential misconduct or regulatory violations.

Communications will initially be directed to the individuals designated at the parent company in Germany to manage the system for receiving communications and reports. These roles are handled by the Compliance Manager and Internal Audit of LAPP Holding. If the information received pertains to LAPP Kabel España, it will subsequently be forwarded to the individuals designated as Responsible for the Internal Information System in Spain.

The online or digital channel is provided by the external service provider **Otris**, which ensures strict and minimal access rights. Communications are submitted through an online form available in the tool, which allows the reporting person to submit a communication by specifying the topic, subject, and situation.

Reports can be made anonymously or with the identity of the informant disclosed. There are no time or technical constraints for submitting a report. The online/written channel is available in German, English, and 18 other languages, and it can be expanded to additional languages if necessary.

The system is confidential and secure. If your preferred language is not listed, a report can still be submitted in any other language.

If you wish to submit a report anonymously or nominatively, click the "Submit Report" button. The subsequent reporting process consists of the following three steps:

1. First, you will be asked to select the appropriate topic for your notification from a provided list. Then, fill out the fields for the subject and the report's text. Write your report in your own words and, if necessary, attach files. Note that the documents may contain information about the author. You can choose whether to remain anonymous or disclose your identity.

It would be helpful to address the following questions in your report, along with any other relevant details:

1. Who was or is involved?
2. What happened?
3. Where did it occur?
4. When did it occur?
5. Who is aware of the situation?
6. How can the facts be proven?

The report can be accompanied by documents that could be useful for the investigation.

2. In the next step, you will set up a password that you can use to access your anonymous mailbox (for tracking your report). You can either create your own password (minimum 12 characters) or generate one automatically. After setting a password, you must confirm it with a security question. Safeguard your password carefully, as it will be required to access your anonymous mailbox.
3. In the final step, you will receive your report ID. Keep it safe, as you will need it to access your anonymous mailbox.

If you have already created a protected mailbox, you can directly access it through the "Follow My Report" button. Here, you must first confirm the security question. If you have not provided an email address, periodically check whether you have received a response to your report. You can access the anonymous mailbox using your report ID and the password you created or generated. In the mailbox, you can track your report, view responses from the recipient, and provide additional information.

As long as you do not enter any data that could personally identify you, the digital reporting system will technologically protect your anonymity.

Periodically check for new responses in the mailbox. We will confirm receipt of the report through the mailbox and, if necessary, ask you questions that may be important for resolving the case.

## **2. Compliance Email**

You can contact our IIS through the following email address:

[Compliance.de.lhi@lapp.com](mailto:Compliance.de.lhi@lapp.com)

Global Compliance Representatives, Internal Audit, and HR handle the information and inquiries received.

The mailbox is subject to strict and minimal access rights. Reports can be submitted in writing, in German and English, 24 hours a day, 365 days a year. You can also schedule an appointment by phone or in person.

### **3. Telephone Hotline**

You can contact the IIS through the following compliance hotline:

+49 711-7838 8888

Incoming phone calls and inquiries are handled by representatives from the Global Compliance, Internal Audit, and Human Resources departments of the parent company in Germany.

### **4. Face-to-Face Channel**

Another channel that the Entity provides to its employees and third parties with whom it interacts is the in-person channel, which allows for verbal communications through face-to-face meetings or videoconferences.

To ensure compliance with the commitments and guarantees outlined in our Policy and the applicable regulations, the Entity has entrusted the management of this channel to the external expert BONET Consulting, ensuring at all times the protection of the informant's identity, both during the appointment scheduling process and throughout the submission and development of the communication.

The professionals at BONET are responsible for processing requests to use this channel, as well as for receiving, safeguarding, and preserving the information provided. In accordance with the law, meetings will be documented through anonymized recordings, subject to the express consent of the informant.

To access this channel, it is necessary to request an appointment through the following contact methods:

1. **Phone:** +34 911 087 727 / +34 930 460 116

Informant service hours are as follows:

1. Monday to Thursday: 8:30 AM to 2:00 PM and 3:00 PM to 6:00 PM
2. Friday: 8:30 AM to 2:30 PM

2. **Email:** [siifexterno@sistema-interno-informacion.com](mailto:siifexterno@sistema-interno-informacion.com)

To ensure the necessary protection and security measures for these types of communications, communications submitted directly via phone or email cannot and will

not be accepted or recorded. These two tools are exclusively enabled for coordinating with the technical staff to arrange the date, time, and location for conducting the communication in an in-person format.

## **5. Compliance Organization**

The Compliance Organization is available globally.

The Global Compliance and Internal Audit departments in Stuttgart are usually involved in handling compliance reports and inquiries that are addressed directly to the Compliance Manager.

You can contact the Global Compliance Manager at the following mailing address:

LAPP Holding SE  
Compliance Manager  
Abteilung Global Compliance  
Oscar Lapp Strasse 2  
70565 Stuttgart, Germany

If you wish to schedule a personal appointment, please send an email in advance to arrange the appointment at [compliance.de.lhi@lapp.com](mailto:compliance.de.lhi@lapp.com).

The regions and subsidiaries of LAPP have regional and local compliance officers who serve as points of contact for reports and inquiries. In general, communication can be conducted in the local language or, at the very least, in English. Reports and inquiries are typically handled locally. If there is any indication of significant misconduct, representatives from the Global Compliance and Internal Audit departments of LAPP Holding SE will take over the case.

The central Global Compliance and Internal Audit departments of LAPP Holding SE are obligated to maintain confidentiality regarding the identities of individuals providing information and all persons named in the information. When processing a communication, they will always act confidentially and impartially, adhering to established guidelines to ensure the independent execution of tasks within the framework of the Internal Information System.

If necessary, other departments/specialized areas with investigative functions may be appointed to conduct an internal investigation of the matter. The aforementioned principles apply accordingly to all investigative personnel.

## **How will your communication or information be processed?**

Within a maximum period of 7 days after receiving the report, its receipt will be acknowledged.

First, a validity check will be conducted. This involves an impartial review of the content and circumstances to verify its plausibility. If necessary, the informant may be asked to provide additional information.

If, after evaluation, the circumstances are deemed implausible—for instance, if they are incomprehensible, legally or factually impossible, or for any other unconvincing reason—the informant will receive the corresponding response. In such a case, the matter will be considered closed, and no further action will be taken.

If the circumstances are found to be plausible, a second step will be taken to conduct an investigation based on criteria established by Spanish laws such as Law 2/2023 of February 20 and Organic Law 3/2018 of December 5. If necessary, other departments/specialized areas with investigative functions may be appointed to conduct an internal investigation of the matter. For the individuals affected, the presumption of innocence applies until a violation is proven.

If the report is found to be false during the investigation, or if, despite appropriate investigative efforts, it cannot be verified or deemed valid, the investigation will be closed. The informant will receive a corresponding response, informing them of the case resolution.

If the report is found to be truthful during the investigation of the facts, appropriate measures will be taken to remedy the identified misconduct and limit any damages, as well as to prevent related risks, if necessary. If internal investigations or the rights of individuals subject to a report or named in it are not compromised, the informant will be provided with a response containing the follow-up measures taken and planned, along with an explanation. This does not apply if it is not possible to respond due to anonymity.

The time required to process reports may vary. Generally, investigations should be completed within three months from the date the informant's communication is received.

### **How will you be protected against discrimination or punishment for reporting potential misconduct?**

No discrimination or retaliation will be tolerated, as stipulated in Directive (EU) 2019/1937 of October 23, 2019, and Spanish Law 2/2023 of February 20, against whistleblowers or those who collaborate in investigations carried out at LAPP. Submitting a report will not result in any negative consequences for the person making it.

The intentional and duly proven misuse of the reporting system, such as knowingly making false accusations against others, is expressly excluded from the scope of protection.

## **Documentation**

Reports received and related activities are documented. This also applies to reports that are found to be implausible. Reports received are documented in the form of a content log.

The documentation of the entire process is subject to a strict access and role management plan. Access is limited to members of the Compliance Committee and, if necessary, to specific departments/specialized areas that may assist in the investigation. Applicable data protection regulations are adhered to; personal data will be anonymized or pseudonymized when necessary.

### **3. External Reporting Channels**

In addition to the internal information channels provided by LAPP Kabel España, there are also external channels available through competent public authorities for reporting regulatory violations or legal non-compliance (serious or very serious criminal or administrative offenses).

On one hand, the Independent Authority for Whistleblower Protection (AIPI), established under Spanish Law 2/2023 of February 20, which regulates the protection of individuals reporting regulatory violations and the fight against corruption, provides an External Channel available at the following web address:

#### **Independent Authority for the Protection of Informants (AIPI):**

- Access to the external channel: <https://www.proteccioninformante.gob.es/canales-de-presentacion-de-informaciones>
- For additional information about the external channel of AIPI, please visit: <https://www.proteccioninformante.gob.es/sistema-de-informacion-canal-externo>

On the other hand, since LAPP Kabel España has its registered office in El Prat de Llobregat, located in the autonomous community of Catalonia, the Catalan Anti-Fraud Office (OAC), under Law 2/2023 of February 20 (of the Parliament of Catalonia) and Spanish Law 3/2023 of March 16, regarding fiscal, financial, and administrative measures for the public sector in 2023, is also competent to address regulatory violations by private and/or public organizations operating in this autonomous community, through the following External Communication Channel:

#### **Catalan Anti-Fraud Office (OAC):**

- Access to the external channel: <https://www.antifrau.cat/es/investigacion/denuncia.html>

- For additional information about the external channel of OAC, please visit:  
<https://www.antifrau.cat/es/preguntas-mas-frecuentes.html>

**Responsible Party for the Procedure Code:**

The responsible party for the Procedure Code is:

LAPP Holding SE  
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70565 Stuttgart, Germany  
Tel: +49 711 7838-01  
Website: [www.lapp.com](http://www.lapp.com)