#### **PROCEDURE**





# REPORTING COMPLAINTS, COMPLAINTS, IRREGULARITIES, VIOLATIONS OF THE LAW

-ORIGINAL-

# Withcomplaints, grievances, irregularities, violations of the law

Author: Anna Grzelik	Approver: Katharina Cyranek
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## PROCEDURE

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# REPORTING COMPLAINTS, COMPLAINTS, IRREGULARITIES, VIOLATIONS OF THE LAW

# 1. Objective

The purpose of the instruction is to describe the rules for submitting complaints and complaints and reporting suspected irregularities and violations of the law in connection with the activities conducted by Aircom Group Sp. z o.o. Sp. k. and Aircom Automotive Sp. z o.o. Sp. k. (hereinafter referred to as Aircom) by its stakeholders / external entities.

## 2. Scope of application

The instruction applies to external persons and entities.

## 3. Liability

The HR and Payroll Team Leader is responsible for the development, implementation and updating of this manual.

#### 4. Procedure

A formalized mechanism for reporting complaints, grievances, irregularities and violations of the law has been developed for local communities and other Aircom Stakeholders. Contractors / / local units / other Stakeholders may lodge complaints and grievances, as well as report irregularities and violations of law (in connection with Aircom's operations) by: — sending an official letter to the following address: Aircom Automotive, Fabryczna 20B, 55-080 Pietrzykowice,

- e-mail to the following email address: <u>complaints@aircom.ag</u>,
- sending a message via the form on the Aircom website: <a href="https://aircom.ag/pl/kontakt/">https://aircom.ag/pl/kontakt/</a>
  Complaints, grievances and reports of violations and/or irregularities may be reported both by filling in the form constituting Annex 1 to this instruction as well as in other forms.
  At the same time, Aircom reserves that incomplete and imprecise reports (especially in the case of anonymous reports) will not be considered.

## 5. Examination of complaints

As soon as a complaint, complaint or notification of irregularities or infringements is received, the Commission shall determine whether the complaint is well founded and decide on further action. Depending on the nature of the complaint, the Commission will appoint an appropriate team to assess it, while maintaining full confidentiality towards the person reporting the above-mentioned issue. The report will be investigated and, if justified, appropriate remedial measures and actions will be taken.



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If it finds a likelihood of violation of the law, the Commission notifies the President of the Management Board of Aircom. If, due to its complexity, the notification requires a longer response time, the reason for the delay and the date of the expected reply and the steps taken to clarify the notification shall be communicated within 30 working days. All entries are registered by Aircom together with photographic documentation (if necessary). The Commission shall take a note of the investigation. The entire process is supervised by the President.

#### 6. Confidentiality guarantee

Information provided as part of a complaint, complaint or notification of irregularities or infringements of the law is confidential and is protected against disclosure to unauthorized persons. The fact of their transfer will in no case adversely affect the situation of the person transferring them. The information provided will be disclosed only to the necessary legal authorities, if necessary, with a simultaneous request for the confidentiality of the personal data of the complainant, complaint, whistleblower and/or violation of the law

#### 7. Monitor instruction effectiveness

Once a year, the Management Board of Aircom commissions a study of the effectiveness and adequacy of the provisions of this instruction and, if necessary, reports the need to update it.

#### 8. Related documents

Appendix 1 – Complaint Form.

#### 9. Revision history

Revision No	Page No. / Point	Brief description of the change	Date	Signature
1		Creation of the procedure	12.05.2023	