Rules of procedure for the complaints process within the meaning of the Whistleblower Protection Act ("HinSchG") and the Supply Chain Due Diligence Act ("LkSG")

1. Scope of the process (To which matters does the process apply?)

The process applies to all reports and complaints relating to the HinSchG and the LkSG. The process applies to all reports concerning legal violations within the meaning of the HinSchG that came into awareness in a professional context. Furthermore it applies to all reports related to human rights and environmental risks and violations of duties throughout the supply chain, both by a company which is part of the Webasto group and by Webasto's direct or indirect suppliers.

If you have observed violations in the following areas or have justified reason to believe that there may have been a violation in these areas at a company which is part of the Webasto group or a direct or indirect supplier/business partner of Webasto, please report this via one of the reporting channels detailed below.

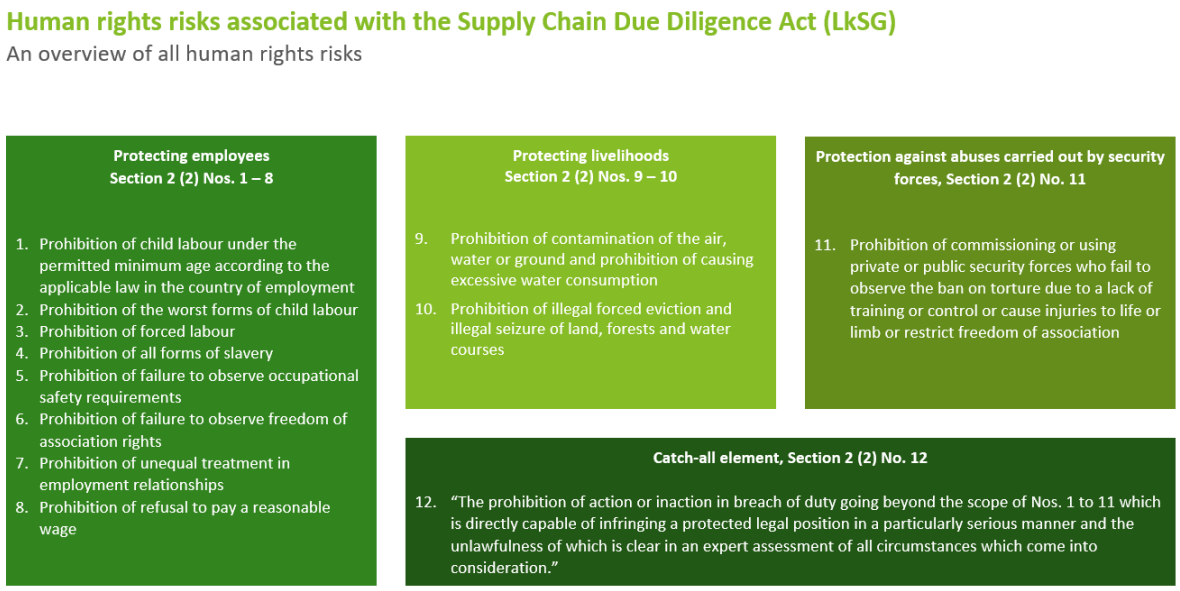
Please report risks or violations relating to the following topics or protected legal positions:

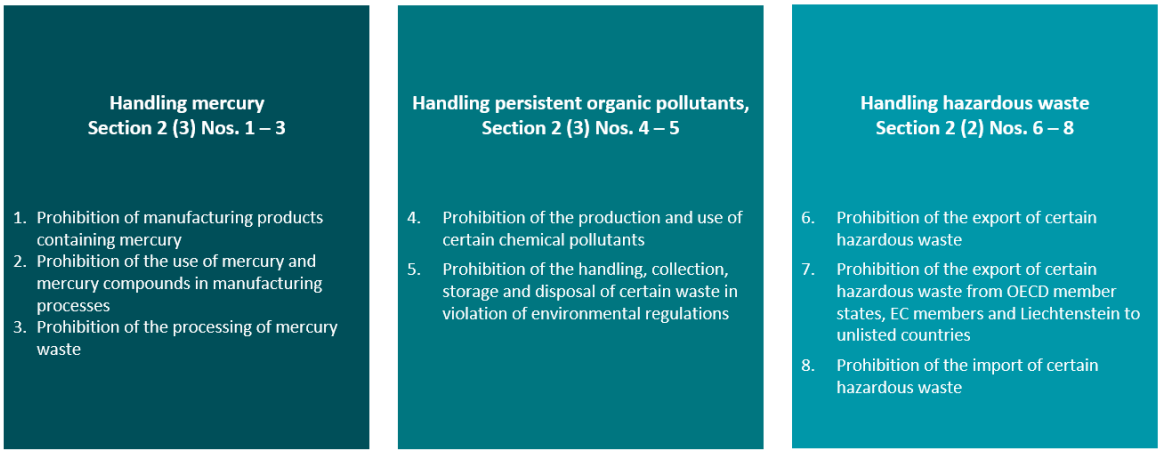
1.1 Reports under the HinSchG

Reports under the HinSchG mainly involve concerns raised about violations of national criminal provisions, possible violations of provisions subject to fines regarding the protection of life, limb, health or rights of employees/their representative bodies and concerns about violations of certain provisions of federal and state legislation as well as directly applicable legal instruments of the European Union and the European Atomic Energy Community. This includes for example bribery, money laundering and breaches of data protection, data security and IT legislation.

If you are unsure whether one of the above legal positions has actually been infringed or is at least at risk, please still submit a report. You do not need to carry out an in-depth expert review before doing so. We will then handle the in-depth review of the legal prerequisites.

1.2 Reports under the LkSG





2. Details of the contact(s) and reporting options (Where can you submit a report?)

- Online group or local reporting site
- Hotline
- Personal Contact per Post/E-Mail/Phone:

For the region ASIA - PACIFIC:

Ray Li
Compliance
Webasto Roof Systems China Ltd.
No. 33, Lane 466, Yindu Road
201108 Shanghai
P. R. China
Phone: +86 (137) 7435 3025
E-Mail: ran.li@webasto.com

For the region NORTH - and SOUTHAMERICA:

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Compliance
Webasto Roof Systems Inc.
2500 Executive Hills Blvd.
Auburn Hills, MI 48326
USA
Phone: +1 248 563 6301
E-Mail: christopher.connely@webasto.com

For the region EUROPE:

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Compliance
Webasto SE
Kraillinger Straße 5
82131 Stockdorf
Germany
Phone: +49 (89) 85794-54782
E-Mail: wiebke.staerker@webasto.com

General: compliance@webasto.com

More reporting options will be identified over time and based on the annual risk analysis, and these shall be implemented where expedient.

The Compliance Department is responsible for the entire process for reports submitted in Germany. The local Compliance Department is initially responsible for local reports. Overall, the process is overseen by the Chief Compliance and Human Rights Officer, Dr. Hendrik Höhfeld.

As part of the further processing and clarification of the matter, a decision is made on whether the complaint is processed centrally and/or locally and which additional specialist departments are consulted. For example, the following central and/or local departments come into consideration for additional consultation:

- People & Organization Department,
- Legal & Compliance Department,
- Sustainability Department,
- Health, Safety & Environmental Department,
- Purchasing Department,
- Risk Management Department.

3. The whistleblower (Who may submit a report?)

The process is available to any individual. There is no requirement for the individual to be personally affected by the violation or risk. It is also possible to submit a report on behalf of an individual or group of people, for example.

4. Receipt of the complaint and the process (How does the process work?)

Regardless of the channel used to submit the complaint to Webasto (electronically, by telephone, in writing, etc.), the receipt of the complaint is documented in accordance with the legal requirements. In doing so, the identity of the whistleblower is handled as confidential throughout the entire process where this is legally permissible. It is also possible to submit reports anonymously. This is one of the methods of ensuring that the whistleblower does not have to fear any disadvantages (see sec. 12 Protection against reprisals).

The whistleblower receives confirmation of receipt of the complaint within seven (7) days of receipt of the complaint at the latest. This confirmation is provided via the same channel used to submit the complaint. If the report was submitted anonymously via the secured postbox, the confirmation and further communication will also be sent to this postbox. Therefore, please keep your access details somewhere safe, including those for the secured anonymous postbox.

The whistleblower receives regular information about the status of the process, no later than after three (3) months. We would like to ask for your understanding as each case which is reported is individual and not every case can be handled, clarified and concluded at the same speed. Webasto will complete

the process as promptly as possible in order to remedy the reported violations and risks as quickly as possible. The process is described in more detail in the following sections:

5. Communication channel and anonymity (How does communication take place?)

An electronic postbox is set up when you use the online process and when you use the telephone whistleblower hotline. This postbox is the central channel for further communication between Webasto and the whistleblower. Therefore, please always ensure that you keep the access details which you have been provided with somewhere safe.

Depending on how the report was submitted (verbally or in writing), communication from Webasto to the whistleblower will also take place verbally or in writing. This communication will take place via the electronic postbox.

There is also an option to set up this postbox anonymously. By choosing an anonymous postbox, the whistleblower is ensured full anonymity.

6. Reviewing the complaint (What will happen to my report once it has been received?)

The complaint will be reviewed by an independent employee at Webasto. The next steps and specific responsibilities within the company will be defined at this stage. In particular, we will consider whether to consult the following departments:

- People & Organization Department,
- Legal & Compliance Department,
- Sustainability Department,
- Health, Safety & Environmental Department,
- Purchasing Department,
- Risk Management Department.

7. Confidentiality and independence (How do you ensure confidentiality and independence?)

The independence of the individual processing the report is ensured as the processing is generally carried out by a Compliance Officer who is not obliged to follow any instructions when it comes to processing reports and complaints. This is either ensured by legal provisions concerning a specific profession (e.g. for in-house lawyers) or by additional provisions in the individual's employment contract which exclude any obligation to follow instructions for these fields of activity. All of our employees are, of course, contractually required to maintain confidentiality.

8. Clarifying the case (What happens during the process?)

After the case has been assigned to an independent employee, it is discussed with the whistleblower. Then the case is reviewed and, where necessary, clarified further. If the complaint was submitted anonymously, it is also possible to have this discussion carried out anonymously, in particular via the secured postbox.

If the report is rejected, the whistleblower will be notified of this and receive reasons for the rejection of the report. As such, you will receive feedback from Webasto within three (3) months of confirmation of receipt of your report or, in the event receipt was not confirmed, no later than three (3) months and seven (7) days after receipt of your report.

9. Developing a solution

Insofar as this is relevant for defining corrective actions for the report in question, a proposal on corrective actions will be developed in dialogue with the whistleblower. If the nature of the case means that an agreement on the solution will not come into consideration, the whistleblower will be informed about the corrective action which is deemed reasonable. Where necessary, appropriate and expedient, compensation will be considered.

10. Corrective actions

The agreed corrective action and, where there is no agreement, the corrective action which has been adopted and communicated will be implemented as quickly as possible. The process of developing a solution and the time required to implement corrective action is individual and varies in scope and duration depending on the content and extent of the report in question. However, Webasto endeavours to develop effective solutions as quickly as possible and to implement the corrective action as soon as possible. The implementation will also be reviewed retrospectively with regard to continuation and effectiveness.

11. Review and conclusion

The results which have been achieved are evaluated. The whistleblower is informed about the conclusion of the process. The outcome of the clarification of the case during the process and the results which are achieved are archived.

12. Protection against reprisals

Webasto prioritises protecting individuals who submit reports in good faith. This applies to both internal whistleblowers and external whistleblowers, e.g. suppliers. Reports help to ensure that Webasto becomes aware of violations of or risks to human rights or environmental obligations within the meaning of the LkSG or (potential) legal violations within the meaning of the HinSchG, that came into awareness in a professional context, at an early stage, thus allowing Webasto to take prompt corrective action. This protects the individuals to which the report relates, the environment and Webasto. This is the only way for us to ensure that our Webasto company objective of uncovering malpractice by Webasto employees or malpractice at any point in the supply chain can be achieved. Accordingly, Webasto will not tolerate any reprisals or any other form of disadvantage to whistleblowers. We have also set out this commitment in our Code of Conduct (see 7.). Both Webasto employees and direct and indirect suppliers can expect measures (of an employment law or business nature) to be taken if Webasto becomes aware of any reprisals against whistleblowers.

13. Review of the effectiveness of the process

The effectiveness of the process is reviewed annually and as required. Where necessary, changes will be made to the process and corrective actions. During the review of the process the interests of the persons potentially involved in the complaints process are being considered appropriately. The process may be adapted over time on the basis of the results of the risk analysis, in particular also to make it easier for groups requiring particular protection to access the process. If the review reveals that the complaints process is not effective, the process will be adapted immediately.