

## 1 Purpose of the complaint procedure

At Rheinmetall, we accept responsibility for our

- employees,
- Products,
- environment, and
- society.

For Rheinmetall, sustainability is not a buzzword; it is a central element of our corporate management. Sustainable management requires clear values, the willingness to change, and the capacity to generate growth.

As part of our international business activities, we place particular emphasis on respecting human rights and protecting the environment. This includes ensuring fair, safe and healthy working conditions within Rheinmetall and our global supply chain. To promote these objectives, we have established our “**Rheinmetall Supplier Code of Conduct**”, which must be followed by all our contractual partners.

We regularly review and strive to continuously improve compliance with the standards set by this code. An important tool for this is the complaint procedure described below, which allows us to identify human-rights-related and environmental risks along our supply chain at an early stage and to eliminate violations.

## 2 Who can submit a complaint?

The complaint procedure is used to investigate complaints regarding human-rights-related and environmental risks and breaches of duty that have resulted from the economic activity in Rheinmetall AG’s own area of operations or in a supplier’s sphere. The complaint procedure is available both to whistleblowers external to Rheinmetall and to Rheinmetall employees; complaints can be submitted with a name or anonymously.

Whether the whistleblower is directly or indirectly affected is irrelevant when submitting a complaint. Complaints can, therefore, be submitted, for example, by

- business partners,
- employees of direct or indirect suppliers,
- trade unions or non-governmental organisations, or
- other third parties, such as residents of local sites.

## 3 What kinds of complaints can be submitted?

The complaint procedure gives individuals and enterprises the opportunity to point out human-rights-related and environmental risks as well as human-rights-related and environmental breaches of duty that have occurred as a result of the economic activity of Rheinmetall and its companies in their own area of operations or in the supply chain.

## 4 How can complaints be submitted?

Rheinmetall maintains a comprehensive whistleblower system that is also available for complaints related to the LkSG (*Lieferkettensorgfaltspflichtengesetz* (German Supply Chain Due Diligence Act)). All Rheinmetall employees and external parties can submit their complaints as follows:

- via **Rheinmetall’s electronic whistleblower system**, which is available around the clock and free of charge.  
This system is a globally uniform communication channel for investigatory questions and is available to both internal and external parties concerned. The compliance organisation ensures that, in compliance with legal regulations, the forwarded information is treated confidentially on a strictly need-to-know basis and is followed up on by the concerned stakeholders who are to be involved.

- **By post or by internal mail** using the following address:  
Rheinmetall AG  
Compliance – Central Investigations  
(Please include the note “Personal and confidential, not to be opened by another party”)  
Rheinmetall Platz 1  
40476 Düsseldorf  
or by **email** to  
speakup@rheinmetall.com
- to our external and independent **ombudsmen** by post, email, or telephone using the following contact details:

**Dr. Rainer Buchert**

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## 5 Content of the complaint

Rheinmetall requires the following information in order to evaluate a complaint:

- **Nature of the incident**  
Complaints regarding human-rights-related and environmental risks or breaches of duty
- **What happened?**  
Description of the incident, details of the concerns; harm that has already occurred and/or potential for harm (e.g. monetary harm or harm to reputation)
- **Where did it happen?**  
Location of the incident
- **When did it happen?**  
Information about the time of the incident, in particular whether the incident is still ongoing
- **Who is/was involved?**  
Parties involved in the incident, accused parties
- **Who has been informed?**  
Others who may have knowledge of the incident (management informed?) and other eye-witness reports
- **Supplementary information: How did it happen?**  
Information on which processes have been circumvented or which process weaknesses have been exploited; if possible, explain how the matter can best be resolved.

## 6 Who processes complaints?

**Central Investigations** in Rheinmetall AG's Compliance Department receives all incoming complaints and is responsible for processing them. Incoming complaints are handled confidentially by several compliance specialists here.

## 7 The complaint procedure in detail

### 1. Confirmation of receipt of the complaint

After a complaint has been received, it is documented and receipt is confirmed by Rheinmetall within a reasonable number of days.

### 2. Review of the complaint

First, the reported circumstances are reviewed and assessed with regard to whether they involve human-rights-related or environmental risks or breaches of human-rights-related or environmental duties. For this purpose, Rheinmetall will contact the complaining party, if possible, and will discuss the facts together with the complaining party. If there is insufficient information for reviewing the circumstances described, Rheinmetall will try to obtain the missing information. If Rheinmetall is unable to do so, the reported circumstances cannot be pursued further. If contact is possible, the complaining party will be informed of the procedure's termination and of the reasons for this.

### 3. Clarification of the circumstances and development of a solution

Accepted complaints will either be processed by **Central Investigations** itself or forwarded to a responsible office, such as within Rheinmetall AG, or to the responsible local compliance employee while adhering to data protection and the principle of confidentiality.

If, as a result of the investigation of the circumstances, the investigation team comes to the conclusion that there has been no violation with regard to human-rights-related and environmental risks or any breach of human-rights-related and environmental duties, the procedure will be closed. If contact is possible, the complaining party will be informed of the procedure's termination and of the reasons for this.

If, on the other hand, the investigation team confirms that there has been a violation with regard to human-rights-related and environmental risks or a breach of human-rights-related and environmental duties, a proposal for further action will be developed. In particular, preventive and corrective actions will be taken, and the complaining party will be involved to an appropriate extent, provided that contact is possible and reasonable.

### 4. Completion and follow-up

If contact is possible, the complaining party will be informed of the completion of the complaint procedure and will have the opportunity to provide feedback on the complaint procedure. **Central Investigations** will then monitor compliance with the agreed preventive and corrective actions.

### 5. Assessment of the complaint procedure's effectiveness

Rheinmetall reviews the effectiveness of the complaint procedure as needed and at least once a year.

## 8 Protection against retaliation

Rheinmetall does not tolerate any form of retaliation against whistleblowers. Protecting whistleblowers against discrimination or punishment as a result of submitted complaints is a central element of our complaint procedure.

## 9 Disclaimer

The complaint procedure described here is not intended for the individual enforcement of the law and, therefore, does not constitute a negotiation that suspends the statute of limitations within the meaning of Section 203 BGB (*Bürgerliches Gesetzbuch* [German Civil Code]) or a corresponding regulation of legislation applicable to claims to compensation.