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OCTOBER 2023

# Rules of Procedure for Complaints according to Sec. 8 of the German Supply Chain Due Diligence Act

This document constitutes the rules of Procedure for Complaints according to Sec. 8 of the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz - LkSG*) for ABB AG, Mannheim, and its subsidiaries ABB STOTZ-KONTAKT GmbH, Heidelberg, and Busch-Jaeger Elektro GmbH, Lüdenscheid, which fall under the scope of the LkSG. ABB AG and its subsidiaries are part of the international ABB Group with headquarters in Zurich, Switzerland.

For the ABB Group, respecting and promoting human rights and environmental standards is a top priority, as is ensuring the highest possible level of occupational safety. We therefore take measures throughout the Group with the aim of identifying, preventing and minimizing human rights and environmental risks in our own operations and our supply chains. For us, a core element of these due diligence obligations are effective channels for reporting human rights and environmental risks or violations (amongst any other risks or violations of our [ABB Code of Conduct](#) or any applicable local laws). With this, the complaints and reporting channels serve both as an early warning system as well as an access to appropriate remediation. ABB has established such channels already since 2006.

These rules of procedure provide information on the main features of the complaints/reporting process, access to the reporting channels and responsibilities. Furthermore, they also provide information on what happens with incoming reports and complaints and how they are processed. It is important for ABB to present this information in a comprehensible manner and to create the greatest possible transparency about the process.

If you report information on human rights and environmental risks and violations, you help us in our efforts to address your concerns and take preventive or remedial action if necessary.

## What kind of information can you report?

You can report human rights and environmental risks or violations that have arisen as a result of the economic actions of ABB AG and its mentioned subsidiaries in their own business operations or in their supply chains.

## Who can make a report?

Any person who learns of the mentioned risks or violations can make a report, regardless whether that person is itself affected by such risk or violation and regardless whether it happened in Germany or abroad.

## How can I report?

Complaints and reports can be submitted in different ways at any time. All complaints and reports, regardless of the way in which they are received by ABB, are processed immediately and in the same way.

- ABB has established an electronic reporting system where complaints or reports can be entered into a web form. You can reach this under <https://secure.ethicspoint.eu/domain/media/en/gui/59351/report.html>. You can choose the language in which you want to report on the top right of the page.
- Alternatively, you can telephone the ABB stakeholder helpline either at +41 43 317 33 67 (international call rates apply) or select a national number for your country under <https://secure.ethicspoint.eu/domain/media/en/gui/59351/report.html>, e.g. from Germany the number is 0800 1819091 (toll free). The ABB stakeholder helpline is available 24 hours a day, 7 days a week and you can make your report in all major languages.
- You can also send a letter to the following address:

ABB Ltd.  
Chief Integrity Officer  
Affolternstrasse 44  
8050 Zürich, Schweiz

Both the portal for the web form and the helpline are hosted on behalf of ABB by Navex, an independent third party service provider.

## What should you include in a report?

Reports should be based on facts and contain all relevant facts to the extent known to you. We ask you to provide as detailed information and explanations as possible, including dates, names of companies and persons involved, countries etc. so that the ABB can investigate your report fairly and thoroughly. Reports which do not contain sufficient facts can hardly be reviewed and investigated.

Please be aware that the information you provide or the allegations that you make could result in decisions that affect employees of ABB and other third parties involved in the matter. We therefore kindly ask you to provide us with information that is accurate to the best of your knowledge.

It is your free choice whether you want to disclose your identity and provide your contact details or want to stay anonymous. If you choose to make your report via our web form contact can be maintained throughout the investigation even if you want to stay anonymous over the messaging system provided by Navex.

## Who is responsible for processing the report?

Reports made directly to ABB or via Navex (see above) will be submitted to and first assessed by our Integrity Investigations & Monitoring (IIM) team, a dedicated global investigations team within the ABB Group Legal & Integrity Function. Depending on the severity and type of allegations raised, the investigation may be conducted by either the IIM team or other appropriate functions, such as Legal & Integrity, Human Resources, Human Rights or if appropriate also by external consultants. If you prefer your report to be handled by a local representative of ABB AG or its mentioned German

subsidiaries, please indicate this preference when making your report. All persons handling reports are in this role:

- impartial
- independent and not bound by instructions
- bound to secrecy
- appropriately trained
- equipped with sufficient time resources

### **How will your report be processed?**

Regardless of the channel you choose for your report, we will confirm to you the receipt of the report. If you choose to raise a concern through the web form, you will be given a report identification number so that you can follow the progress of your report online or by telephone. In case you have called the helpline, a communication specialist will prepare a report on the contents of the call.

Your report will be forwarded to our IIM team unless you indicated otherwise (see above). The IIM team will review the report and, if the matter relates to human rights concerns or environmental risks, inform the Human Rights Officer of ABB AG and its mentioned subsidiaries who has been appointed in accordance with LkSG. The matter will then be referred on for further investigation by subject matter experts, as is appropriate (see above). The mentioned Human Rights Officer will be involved in the whole investigation process including its conclusion.

It is then analyzed which investigations should be made to clarify the facts underlying the report. In this process, it is also checked which ABB company or which supplier is affected by the report. If necessary, we will contact you to discuss and clarify the facts and ask for further information and/or documents (if you provided us with a possibility to contact you).

If investigations show a violation of human rights and/or environmental obligations corrective action is initiated immediately and its implementation is followed up.

### **How are you protected when making a report?**

As stipulated in the **ABB Code of Conduct** and in ABB's specific **Whistleblower Protection Policy**, protecting whistleblowers who make reports or complaints in good faith is a top priority at ABB and an important part of our reporting framework. Retaliation against any reporter who in good faith reports a concern will not be tolerated and, if they occurred, will be subject to disciplinary action.

Each complaint and report is processed only by a small group of selected and specially trained employees.

All personal data and other information that allows conclusions to be drawn about the identity of the person making a report is treated confidentially. This also applies after conclusion of the investigation.