

**CLAAS**



Rules of Procedure for the Complaint Procedure  
in accordance with Section 8 Para. 2 of the  
German Act on Corporate Due  
Diligence Obligations in Supply Chains  
(Lieferkettensorgfaltspflichtengesetz – LkSG)

dd. 21.08.2025

V. 2.0

## Foreword

The whistleblower system already existing at CLAAS has been supplemented with regard to the requirements of the complaint procedure according to § 8 Para. 2 German Supply Chain Act.

### 1. Scope

The complaint procedure can be used to report human rights or environmental risks as well as violations of human rights-related or environmental obligations according to § 2 Para. 2 and 3 Supply Chain Act that have arisen through the economic activities of a company in its own business area, or of a direct or indirect supplier.

In the case of reports by third parties, e.g., business partners, customers, suppliers, or employees of service providers and external companies who access our whistleblower system and submit reports, this procedural order shall apply.

### 2. Definitions

**Whistleblower system** refers to a system for obtaining information that is used in companies to provide employees and third parties with a confidential communication channel for reporting allegations and complaints.

**An ombudsman** works as an independent lawyer. He is impartial and is not subject to instructions from the company regarding substantive case handling. The ombudsman is bound by confidentiality.

**The CLAAS Group** includes all companies that are or will be affiliated with CLAAS KGaA mbH within the meaning of §§ 15 ff. AktG (German Stock Corporation Act).

**Complaints** under these rules of procedure are notifications within the meaning of the Supply Chain Act regarding human rights and environmental risks as well as violations of human rights-related and environmental obligations that have arisen through the economic activities of a company in its own business area or of a direct or indirect supplier.

### 3. Complaint Procedure Work

#### 3.1. Who can submit a complaint?

Any person or organization has the possibility to submit complaints.

#### 3.2. For what type of complaints can the whistleblower system be used?

The whistleblower system serves to detect and clarify behaviors that fulfill a criminal offense directed against company interests (particularly in the areas of economic crime, IT security, sexual harassment, as well as violations of antitrust law, competition, or data protection) and behaviors that violate human rights, environmental protection concerns, or the general equal treatment law.

The present complaint procedure is intended to enable reporting of complaints regarding human rights and environmental risks as well as violations of human rights-related or environmental obligations that have arisen through the economic activities of a company in its own business area or of a direct supplier.

### **3.3. What compliant channels are established at CLAAS?**

Complaints can be submitted through the independent ombudsperson – Dr. Thiel von Herff.

Communication can be conducted by mail, email, internet or telephone using the following contact information:

Thiel von Herff | Rechtsanwälte  
Dr. Carsten Thiel von Herff, LL.M.  
Loebellstraße 4  
D – 33602 Bielefeld  
Phone +49 521 557 333 00  
Fax +49 521 557 333 44  
Email: [ombudsmann@thielvonherff.de](mailto:ombudsmann@thielvonherff.de)  
Internet: [www.report-tvh.de](http://www.report-tvh.de)

If desired, the ombudsman maintains the confidentiality of the identity of a reporting person.

### **3.4. How are complaints handled?**

Every complaint is treated confidentially and in consideration of applicable data protection laws.

### **3.5. How are incoming complaints processed?**

The ombudsman receives the complaint and, if necessary, discusses the facts with the reporting person. In any case, the reporting person receives an acknowledgment of receipt. Once the ombudsman has received the report – whether by telephone or through the whistleblower system – an examination is conducted to determine whether a breach of duty within the meaning of the Supply Chain Act or a violation of other laws or internal rules may exist. If there are sufficient indications for this, the ombudsman forwards the facts presented to him in permissible form to CLAAS for investigation. The ombudsman does not conduct investigations himself in order not to endanger his neutrality.

The whistleblower is promptly informed about the receipt of the report.

Once the facts are communicated to CLAAS, the facts are examined at CLAAS for plausibility and consistency, and an attempt is made to gather all essential information.

CLAAS subsequently decides on initiating internal investigations by the specialist department. The specialist department is authorized to involve additional internal persons in the investigations if this appears necessary and appropriate for clarifying the facts. This may particularly be the case with reports originating from foreign companies of the CLAAS Group. Once the investigations are completed and the violation of human rights-related or environmental obligations in the company's own business area and/or at the direct or indirect supplier is imminent or has already been confirmed, the responsible specialist department develops a solution proposal for further procedures (especially prevention and remedial measures). The subsequent implementation of the solution proposal is monitored by the responsible department.

The processing time is highly variable and can range from a few days to several months. Nevertheless, CLAAS strives to conduct the investigation promptly.

The reporting person can inquire about the status at any time with the ombudsman. They receive feedback on follow-up measures regarding the report within the statutory deadline after receipt of the report. At the latest after completion of the process, they are informed by the ombudsman about the result within the legally permissible scope. The involvement of the ombudsman is free of charge for the whistleblower.

If a report turns out to be false or insufficient evidence is found, this is documented accordingly and the investigation is therefore concluded.

#### **4. How is the reporting person protected?**

The protection of the reporting person is ensured through confidential treatment of their identity. If the person provides their name and/or contact information, these are stored and used in consideration of data protection requirements. The same applies if their data is to be transmitted to other entities. Any retaliatory action directed against the reporting person will not be tolerated.

#### **5. External Reporting Offices**

The reporting person also has the possibility to use external reporting to the competent state institutions of the Federal Republic of Germany or the European Union.