

RULES OF PROCEDURE FOR COMPLAINTS

Pursuant to section 8 of the German Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz- Supply Chain Act) and the German Whistleblower Protection Act (Hinweisgeberschutzgesetz)

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1 Preamble

Respect for human rights is an integral part of N3's culture. As a globally operating company, we are convinced that our goal of sustainably connecting people, cultures and economies can only be achieved in the long term if the realities of people's lives around the world allow them to decide freely and responsibly whether to take up our offer. It is therefore important to N3 to harmonise its business activities with internationally recognised principles and voluntary commitments and not only to anchor respect for human rights as an integral part of its own corporate culture, but also to address and demand it appropriately in the supply chain.

In order to enable persons to inform N3 of human rights and environmental risks as well as violations of human rights or environmental obligations within the meaning of § 2 LkSG that may have arisen as a result of the economic activities of N3 or a supplier, N3, as a joint venture company of Lufthansa Technik AG and thus part of the Lufthansa Group, uses the central Whistleblowing System of the Lufthansa Group. With these rules of procedure, N3 establishes clear guidelines that ensure that every incoming report is handled carefully and transparently by N3/ the Lufthansa Group and in accordance with the requirements of Section 8 LkSG.

2 Objective and Purpose

The aim of the complaints procedure is to obtain information about human rights or environmental risks within the meaning of § 2 LkSG from N3 and its suppliers as early as possible in order to enable N3 to prevent the occurrence of human and environmental rights violations. If a violation of human rights or environmental obligations within the meaning of Section 2 LkSG has already occurred as a result of N3's business activities, including in its supply chains, the complaints procedure serves to provide those affected with access to N3 and possible and appropriate remedies. In addition, information is used to supplement the regular analyses of human rights and environmental risks at N3 and in N3's supply chains and to take preventive measures to prevent such risks from arising or occurring.

In order to achieve the objectives of the complaints procedure, these Rules of Procedure set out the following:

- the scope of these Rules of Procedure for Complaints,
- the principles and the procedure according to which complaints are handled at N3 and within the Lufthansa Group,
- responsibilities for the implementation of the complaints procedure and
- the rights of the parties involved.

3 Scope of Application

These Rules of Procedure apply to any information, including anonymous information, provided by one or more persons ("whistleblowers") regarding human rights or environmental risks and violations of human rights or environmental obligations within the meaning of § 2 LkSG, which have arisen as a result of the economic activities of a company of N3 or the direct or indirect suppliers of N3 in the supply chain, within the meaning of § 8 LkSG ("complaint").

4 Procedures and Responsibilities

4.1 Principles of procedure

N3 carefully investigates the facts underlying a complaint as part of the complaints procedure, taking into account the legal and internal requirements and regulations as well as the rights of the parties involved in the procedure. The complaints procedure should be conducted swiftly and without interruptions. The complaints procedure is transparent. N3 discusses the respective complaint and the facts on which it is based with the respective whistleblowers, provided that they either provide information on how they can be contacted as part of the complaint or, in the case of a complaint submitted anonymously via the electronic whistleblower system, set up a mailbox through which makes communication with the anonymous whistleblowers possible. The whistleblowers are regularly informed about the status of the procedure.

The conclusion of the procedure is communicated to the whistleblowers, as are any measures adopted to minimise an identified human rights or environmental risk or to end or minimise the consequences of an identified violation of human rights or environmental obligations caused by N3 or a direct or indirect supplier. The complaints procedure is documented. Every incoming complaint is recorded and the individual procedural steps and any resulting measures are documented in a comprehensible manner.

Effective protection of whistleblowers against discrimination or penalisation as a result of a complaint is guaranteed. Complaints can be submitted anonymously. Anonymity has no influence on the implementation of the complaints procedure.

4.2 Admissibility

Any person may submit a complaint to N3. Complaints may be submitted to N3 in writing or verbally, including anonymously. Complaints that are based on untrue factual allegations or are aimed solely at discrediting persons or companies or otherwise constitute an improper use of the complaints procedure are not complaints within the meaning of these Rules of Procedure.

4.3 Complaints channels

Complaints can be submitted via one of the following complaint channels:

- in writing via the Lufthansa Group's electronic whistleblowing system used by N3,
- in writing, by telephone or in person via the ombudsperson of N3 or the Lufthansa Group,
- in writing by e-mail and
- in writing by letter to the business address of N3 Engine Overhaul Services GmbH & Co. KG

Information on how to contact the complaints channels (telephone numbers, web links, e-mail address, business addresses, ombudsperson) can be found in the Appendix to these Rules of Procedure.

Employees of N3 can also address complaints via all channels that have been agreed between the employee representatives and N3 for this purpose.

4.4 Procedure

The grievance procedure consists of a preliminary procedure, a main main procedure, the conclusion of the procedure and, if applicable, the monitoring of the success of the measures adopted.

All human rights and environmental complaints submitted via one of the channels mentioned in section 4.3 are first forwarded to the Lufthansa Group Human Rights Office.

4.4.1 Pre-procedure

The complaints procedure begins with the receipt of a complaint by N3 or the Lufthansa Group whistleblower system used by N3 via one of the complaints channels. The information submitted with a complaint should, if possible, contain the facts on which the complaint is based, including all relevant names, data, documents and a detailed description of the complaint.

Upon receipt, the complaint will be checked for plausibility and whether there is a reference to human and environmental rights within the meaning of §2 LkSG.

N3 resp. Lufthansa Group will confirm receipt of the complaint to each whistleblower within ten days. Confirmation of receipt will only be provided if whistleblowers have either provided information on their availability in the context of their respective complaint or, in the case of a

complaint submitted anonymously via the electronic whistleblower system, have set up a mailbox through which communication with anonymous whistleblowers is possible.

If N3/ the Lufthansa Group determines that a complaint is irrelevant or implausible, the whistleblower will be informed within the same period that no further action will be taken. Otherwise, the main proceedings will take place.

4.4.2 Main proceedings

If the complaint is plausible, N3/ Lufthansa Group will investigate it objectively and comprehensively, taking into account the legal and internal requirements and regulations as well as the rights of all parties involved in the proceedings.

As part of the investigation, the whistleblower will be contacted to discuss the complaint and obtain a detailed account of the facts. The prerequisite for this is that the whistleblower has either provided information on how they can be contacted as part of their complaint or, in the case of a complaint submitted anonymously via the electronic whistleblowing system, has set up a mailbox through which communication with the anonymous whistleblower is possible.

The main investigation may, depending on the case, involve interviewing suppliers, witnesses or other parties who have knowledge of the facts described in the complaint. N3/ Lufthansa Group may commission third parties with the investigation who are bound to objectivity and confidentiality by contract or for professional reasons.

The employees of N3/ the Lufthansa Group entrusted with the implementation of the complaints procedure are obliged to maintain confidentiality and impartiality when investigating the complaint. N3/ the Lufthansa Group will provide feedback to the whistleblower within three months of confirming receipt of the report at the latest. The feedback contains the current status of the investigation, as well as information on measures already taken and planned follow-up measures. Information on the discontinuation of proceedings due to lack of evidence or other reasons is also possible.

4.4.3 Conclusion of proceedings

Depending on the outcome of the investigation, a decision is made as to which remedial or preventive measures are necessary to end the identified risks or violations or to minimise their extent and prevent a repetition of the violation. These can extend to consequences under labour law for employees or the termination of business relationships with suppliers.

The whistleblowers are informed of the conclusion of the complaints procedure and its outcome.

Once the procedure has been completed, N3/ the Lufthansa Group follows up on the implementation of the of the remedial measures. The results of the implementation are evaluated. Depending on the case, this may take place in dialogue with the whistleblower

4.5 Protection of whistleblowers

Within the framework of the law, N3 guarantees effective protection of the whistleblower against discrimination and penalisation on the basis of the complaint, insofar as this is possible. As a matter of principle, every complaints procedure is carried out anonymously and neither the companies involved nor employees of N3/ Lufthansa Group outside the complaints procedure nor any affected suppliers are provided with information about the person of the whistleblower or such information that allows conclusions to be drawn about the person, insofar as this is known.

Whistleblowers who are employees of N3 are protected from disadvantages, disciplinary measures and discrimination ("retaliation") because of a complaint. Retaliation against whistleblowers will not be tolerated and will itself lead to disciplinary action. The complaints office must be informed immediately of any indications of retaliation.

Whistleblowers who are not employees of N3 are protected by the fact that no information about their person or information that allows conclusions to be drawn about their person will be passed on. N3 resp. Lufthansa Group will endeavour to ensure that suppliers neither investigate the identity of a whistleblower nor disadvantage or punish whistleblowers.

4.6 Responsibilities

The N3 Human Rights Officer, supported by the "Human Rights and Discrimination Prevention" team of Deutsche Lufthansa Aktiengesellschaft, is responsible for the implementation of the complaints procedure within N3, insofar as complaints relate to the business activities of N3 in its own business area.

If complaints relate to the business activities of a supplier, the N3-LkSG coordinators are responsible for implementing the complaints procedure with the support of the "Procurement Governance, Processes & Continuous Improvement team" of Deutsche Lufthansa Aktiengesellschaft.

When conducting the complaints procedure, the employees of these teams are obliged to investigate and assess the complaints objectively and impartially with regard to all relevant aspects of human rights and environmental risks and obligations. They are not bound by instructions from N3/the Lufthansa Group when conducting the complaints procedure and are obliged to maintain confidentiality.

4.7 Data protection

Personal data is collected, processed, transmitted and stored as part of the complaints procedure in compliance with data protection regulations. § Section 10 (1) LkSG applies.

5 EFFECTIVENESS OF THE COMPLAINTS PROCEDURE

The effectiveness of the complaints procedure is reviewed at least once a year and on an ad hoc basis. An event-driven review is carried out if N3 has to expect a significantly changed or significantly expanded risk situation in its own business area or with its direct suppliers, for example due to the introduction of new products, projects or a new business area.

The review includes, among other things, the actual use of the complaints procedure by whistleblowers, compliance with these rules of procedure in the context of complaints procedures, the monitoring of any remedial measures taken and any necessary adjustments to the risk analyses required under the LkSG.

The effectiveness of the complaints procedure is reviewed by the N3 Human Rights Officer of N3, the Human Rights and Discrimination Prevention team of Deutsche Lufthansa Aktiengesellschaft and the Internal Audit department of the Lufthansa Group.

6 Attachment and Complaint Channels

- Information on how to contact the complaints channels Ombudsperson of N3/ of the Lufthansa Group

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