

PROCEDURE FOR LODGING COMPLAINTS

This document describes the rules for lodging complaints related to AXTONE operations by the Employees of the Group and stakeholders / external units.

1) Violation of law regulations reported by the Group Employees.

All Employees of the Group may report any breach of law and actions which violate the company regulations, procedures, instructions as well as the Labor Code or any other applicable legislation. First, any non-compliance should be reported to the Employee's immediate Superior. If the Employee is not able or does not want to talk about it with the Superior, the fact of violation should be reported to the Plant Manager or / and to HR.

2) Lodging complaints by external individuals / units.

The unified mechanism of lodging complaints has been developed to meet the needs of local communities and other stakeholders of the Group. It also includes the issues related to environment protection and OHS.

Individuals / local units / other stakeholders may lodge complaints and grievances (related to the operations of AXTONE) by:

- submitting an official letter at the headquarters of the company (form ZKF-0078 for lodging complaints / grievances),
- telephone,
- email (form ZKF-0078 for lodging complaints / grievances).

A special point of reception where complaints can be lodged has been set up by the Group at the gatehouse of the plant in Kańczuga and also the following email address and phone number have been made available for this purpose: uwagi@axtone.eu and the phone: 0 16 649 24 03.

3) Complaints are processed in the following way:

- The Group representative, assigned to contact the local community, will contact the individual/ unit who lodged the complaint within 10 business days in order to discuss the situation,
- Depending on the nature of the complaint, the person who is to process the complaint will put together a proper team to investigate it while taking into account complete confidentiality of the complaining party.
- The complaint/ grievance will be processed and if found justified, suitable countermeasures and corrective actions will be introduced. A reply will be given within 30 business days.
- If the complaint/ grievance, due to its complexity, requires longer time for a reply to be given, the reason for such delay and the date of expected reply as well as the steps taken to investigate the complaint will be communicated within 30 working days.

The whole process will be supervised by HR. All reports are registered by the Group together with photo documentation (if necessary).

4) Duty of confidentiality.

All submitted information is confidential. The individual who has submitted the information will not, in any case, be affected by the fact of its submission. The submitted information will only be revealed to appropriate legal authorities, if it is necessary, with a request to keep the personal data of the submitting person confidential.

Procedure of lodging complaints:

