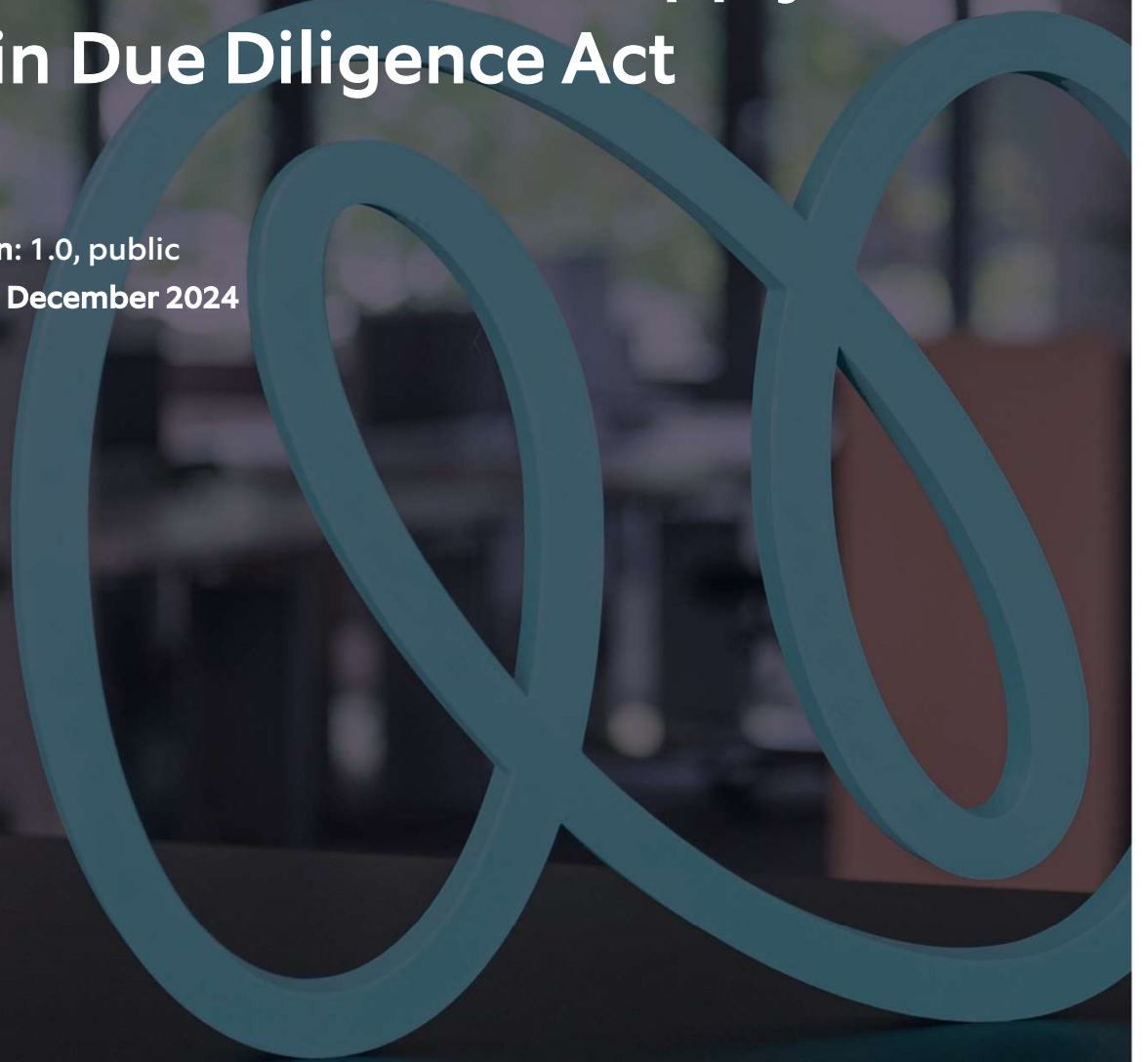


# Policy for Complaints Procedure under the Supply Chain Due Diligence Act

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# Table of Contents

Table of Contents .....	1
1. What is the purpose of this policy?.....	1
2. What type of complaints can be submitted? .....	1
3. Who can submit a complaint? .....	2
4. How can a complaint be submitted? .....	2
5. Who is responsible for processing a complaint? .....	2
6. How are whistleblowers protected?.....	3
7. What happens after a complaint is submitted? .....	3
8. Can a disclosure also be made to external bodies? .....	4
9. How do we ensure this policy is effective?.....	4

# 1. What is the purpose of this policy?

This policy outlines how we, as the Nagarro group (“**Nagarro**”) handle complaints related to risks and violations of human rights or environmental standards within our operations and supply chains. It is designed to encourage you to report any potential risks or violations. In accordance with the German Supply Chain Due Diligence Act (LkSG), we ensure that these concerns are addressed efficiently and effectively. We guarantee that this process is handled with the utmost security and confidentiality, while also maintaining transparency. The policy is binding for all companies of Nagarro.

At Nagarro, our commitment to human rights and environmental protection is deeply rooted in our core values, which shape our approach to business and social responsibility. Summarized by the word “**CARING**”, these values highlight our dedication to a client-centric, agile, responsible, intelligent, non-hierarchical, and global culture. This framework reinforces our human-first mindset and our commitment to ethical practices, not just within our company but also in our interactions with you, clients and society as a whole.

# 2. What type of complaints can be submitted?

You can submit complaints about:

## 1. Risks of human rights violations pursuant to Section 2(2) of the LkSG:

- Child labor (no 1 and 2)
- Forced labor and all forms of slavery (no. 3 and no. 4)
- Occupational safety and work-related health hazards (no. 5)
- Freedom of association and the right to collective bargaining (no. 6)
- Equality in employment (no. 7)
- Fair wages (no. 8)
- Destruction of vital natural resources through environmental pollution (no. 9)
- Land rights (no. 10)
- Hiring or use of private/public security forces without an adequate command structure or proper oversight to prevent harm (no. 11)
- Any other behaviour, by action or omission, in breach of a duty to act, which is directly interferes with a protected legal position (= other human rights) in a particularly serious manner and which is obviously illegal in a reasonable assessment of the circumstances (no. 12)

## 2. Risks of environment-related violations pursuant to Section 2(3) of the LkSG:

- Provisions of the Minamata convention (nos. 1–3)
- Production and/or use of persistent organic pollutants (POPs) within the scope of the Stockholm Convention as well as the non-environmentally sound handling of waste (nos. 4 and 5)
- Import and export of hazardous waste as defined by the Basel Convention (nos. 6–8)

### 3. Who can submit a complaint?

Basically anyone. If you are aware of a potential violation or threat to human rights or environmental standards, you can submit a complaint. This includes internal and external individuals such as employees, contractors, suppliers and their employees, customers, local residents, investors, other companies, non-governmental organizations (NGOs), or uninvolved parties.

You may submit a complaint whether you are directly or indirectly affected (affected whistleblower) or even if you are not affected (informing whistleblower).

### 4. How can a complaint be submitted?

You should submit a complaint in English free of charge at any time via email through [partner.connect@nagarro.com](mailto:partner.connect@nagarro.com) as designated reporting channel, taking into account that our business language at Nagarro is English. The system is confidential and secure. You can choose to remain anonymous if you prefer.

To ensure a prompt and effective response, your complaint should include all key information and describe the issue as specifically as possible.

### 5. Who is responsible for processing a complaint?

The central responsibility to receive and process a complaint as outlined below lies with Nagarro's Global Risk & Compliance department. Dependent on the nature of the complaint, other departments such as Human Resources, Legal, Finance, and Sustainability and Procurement may be involved.

We guarantee that all individuals responsible for processing complaints will act impartially and independently, are not subject to instructions concerning processing a complaint, are bound by confidentiality, and must protect your identity and that of any third parties. Furthermore, we also ensure that these individuals have the necessary expertise and have received relevant training to handle complaints.

## 6. How are whistleblowers protected?

Nagarro ensures the confidentiality of your identity and those of others named in the complaint and guarantees that unauthorized employees will not have access to this information.

Those involved in the process are bound by secrecy. Additionally, complaints are anonymized to the greatest extent possible before being forwarded internally for further processing. This minimizes the number of people who know your identity. Nagarro guarantees that you will not suffer negative consequences as a result of submitting a complaint.

We will handle all information received in accordance with data protection regulations. Information about your identity may only be passed on to the relevant authorities if required by law or court or official order or if there is reasonable suspicion of a criminal offense.

## 7. What happens after a complaint is submitted?

1. **Acknowledgment:** We will confirm receipt of your complaint within seven working days.
2. **Validation:** We will validate the complaint against the applicability of the LkSG. If the complaint is valid, we will determine if the complaint is sufficiently specified in order to conduct investigation based on the complaint and if it indeed concerns one of our suppliers respectively an entity that would have to be seen as an indirect supplier of ours in the understanding auf section 2(8) LkSG. We validate all complaints as quickly as possible. In case that we conclude that the complaint as is cannot sufficiently be validated, we will inform you immediately and explain why we regard the complaint not be not validated in terms of the LkSG.
3. **Investigation:** Once the complaint is positively validated, we will conduct the necessary investigation on the issue. We investigate all validated complaints as quickly as possible, and we will provide you with a status update no later than three months after receipt of your complaint.
4. **Updates:** We will discuss the facts with you and keep you informed about the progress of the investigation.
5. **Outcome:** If an investigation reveals that a breach, risk, violation, or wrongdoing has occurred, appropriate consequences and measures will be suggested and be taken by the assigned individuals in the Global Risk & Compliance department without delay and these assigned individuals will monitor the measure to be executed. Individuals from the other relevant departments such as Human Resources, Legal, Finance, and Sustainability and Procurement will be brought in for their expertise, dependent on the nature of the complaint. The measures and the time they take depend on the nature and severity of the matter. Remedial actions for risks or violations related to human rights and environmental concerns are implemented with the highest priority and as quickly as possible.
6. **Record Keeping:** We will document and securely store all information related to the investigation as well as the implementation and effectiveness of preventive and remedial measures and will keep any documentation for minimum seven years after receipt of the complaint.

## 8. Can a disclosure also be made to external bodies?

It may also occur that we will be legally obliged to disclose a complaint or an extract of it to external bodies, such as law firms, criminal or competition authorities; this depends on the respective case constellation.

## 9. How do we ensure this policy is effective?

Nagarro will review and update the procedure at least once per year and as well in any case of necessity to update to ensure its continued effectiveness.