

RULES OF PROCEDURE FOR REPORTING HUMAN RIGHTS AND ENVIRONMENTAL RISKS AND VIOLATIONS OF HUMAN RIGHTS AND ENVIRONMENTAL OBLIGATIONS

Complaints Procedure under the Supply Chain Due Diligence Act (LkSG)

1. Introduction and Background

Apollo and its subsidiaries, collectively referred to herein as "the Company", strive at all times to achieve high standards of transparency, good morals and integrity. To ensure compliance with these standards, the Company encourages everyone to report possible human rights and environmental risks or violations of human rights and environmental obligations in their own business or at their suppliers without fear of sanctions, adverse consequences or unfair treatment. The purpose of these regulations is to support this.

Indications of possible human rights and environmental risks and/or violations of human rights and environmental obligations should be reported to our complaints office.

The complaints office is Apollo's Confidential Officer

Contact: vertrauensbeauftragter@apollo-optik.com

These rules only apply to human rights and environmental complaints. They expressly do not apply to personal complaints of any other nature.

2 Definitions

For the purposes of these Rules, the following definitions shall apply:

- CEO: Managing Director of Apollo
- Company: Apollo-Optik Holding GmbH & Co. KG and/or one of its subsidiaries
- Confidential Officer: the Confidential Officer(s) appointed by the CEO for the Company
- Complaints Office: the Confidential Officer of Apollo
- Supply Chain: the actions of the Company in its own business and the actions of its suppliers, direct and indirect.
- Risk: a potential or actual human rights or environmental risk, including a violation of those rights.
- Human rights: relate to the following aspects
 - a. Child labor, forced labor, slavery
 - b. Disregard for labor protection or freedom of association
 - c. Unequal treatment
 - d. Withholding a fair wage

- e. Pollution of the environment with significant effects on people (e.g. harmful soil contamination, water pollution, air pollution, harmful noise emission or excessive water consumption)
- f. Unlawful eviction and unlawful taking of land, forests and waters
- g. Hiring or using private or public security forces where their use results in torture, bodily harm, death or interference with freedom of association.

- Environmental rights: concern the following

- a. Manufacture of mercury-added products, use of mercury (compounds) in manufacturing processes, treatment of mercury waste (Minamata Convention)
- b. Production and use of chemicals under Annex A of the Stockholm Convention on Persistent Organic Pollutants
- c. Non-environmentally sound handling, collection, storage and disposal of waste
- d. Export of hazardous and other wastes as defined in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal & Import of such wastes from countries not party to the Basel Convention.

- Whistleblower: a person who, in accordance with the provisions of these Rules, informs the Company of a risk or violation of human rights or environmental rights.

3 Rules and Scope

1. These Rules apply to everyone. They are intended to make it possible to report Risks along the Supply Chain as well as within the company without having to expect sanctions.
2. These Rules do not apply to complaints of any other kind (in particular personal complaints).
3. The Whistleblower reporting an incident must act in good faith.
4. The Whistleblower who reports an incident must not do so with the motivation of personal gain.
5. A Whistleblower who reports an incident in which he or she is involved shall not be immune from prosecution by the state.
6. These Rules will be made publicly available on Apollo's website in English and German.

4 Procedure

1. Anyone can report information about Risks to the Complaints Office. The Whistleblower has the right to confidential treatment of his/her personal data.
2. The Complaints Office will make a written record of the report and its date at the request of the Whistleblower. It shall have the Whistleblower confirm this record. The Whistleblower shall receive a copy of the record. The Complaints Office is responsible for ensuring that the CEO is promptly informed of a possible Risk

and/or breach and the date on which it was reported. It is also responsible for ensuring that the CEO receives a copy of the written record (if one is made).

3. The Complaints Office shall send an acknowledgement to the Whistleblower that the report has been received.
4. The Complaints Office shall initiate an investigation into the reported Risk and/or violation immediately after the report.
5. The Whistleblower and the Complaints Office shall treat the report as confidential. No information will be disclosed to third parties inside or outside the company without the consent of the CEO.
6. The Whistleblower will be informed in writing by the Complaints Office or the CEO of the reported Risk and/or violation and the action taken on his/her report within four weeks of the report. If a final decision cannot be announced within four weeks, the Whistleblower will be informed by the Complaints Office or the CEO. He/she will also be informed when he/she can expect to receive information.

5 Legal protection

The Whistleblower who reports a Risk in accordance with these provisions and acts in good faith will not be sanctioned in any way by the Company as a result of his or her report. In particular, Apollo will not accept retaliation against a Whistleblower by others as a result of the whistleblowing; this will result in sanctions against the others in any event.

An employee of the Company in respect of whose activities a tip-off has been made has the right to access the file (but not the personal data) before a decision is taken in respect of his or her position, in order to correct any false information and to be able to prepare his or her defense.