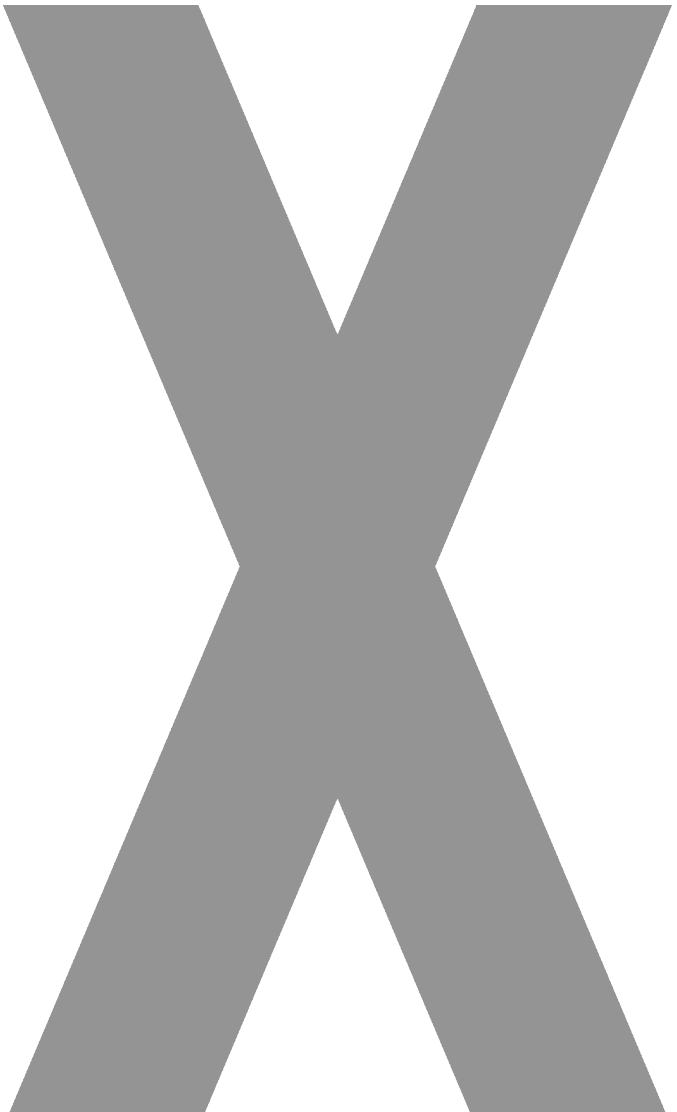
LANXESS
Energizing Chemistry

LANXESS
Complaints Procedure



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Version	Date	Change
2023	15 September 2023	Initial publication
2026	22 September 2026	Editorial revisions (update of links and spelling corrections; no content changes)

1. Object and Purpose

There are many factors which contribute to our company's success. In addition to our employee's knowledge and skills, these include their value-based, responsible, lawful conduct. As a company with international operations, we have a global responsibility to ensure proper conduct. LANXESS therefore expects its employees to always comply with applicable laws and internal policies and procedures to the fullest.[1] Compliance is of great importance to LANXESS along its entire value chain and therefore LANXESS also expects its business partners to comply with legal provisions and international standards in connection with their business activities.[2]

The complaints procedure is an important part of safeguarding our company values and enables us to react at an early stage in order to prevent potential damage to LANXESS, its employees, business partners and other affected parties, or to take corrective measures in the event of violations. It is therefore important for LANXESS to provide a comprehensible and transparent complaints procedure.

2. Who can submit reports/complaints?

Anyone can submit a report or complaint. The reporting channels listed below are available to both LANXESS employees and external individuals.

3. What can be reported/about what can be complained?

Any potential misconduct, violations of legal provisions or internationally recognized standards, LANXESS directives, such as our Code of Conduct or other LANXESS policies and procedures. Also suspected cases of potential violation of human or environmental rights, health and safety at work, occupational and plant safety, product safety, export control, money laundering regulations, antitrust law, corruption and bribery, data protection and information protection can be reported. You can also report

[1] LANXESS Code of Conduct available at: https://lanxess.com/en/company/about-us/compliance/code-of-conduct.

[2] LANXESS Business Partner Code of Conduct available at: https://lanxess.com/en/company/about-us/compliance/business-partner.

suspected cases of potential violations by direct or indirect business partners of LANXESS.

4. How and when can you reach us?

Complaints/reports can be submitted via the following reporting channels:

	Reporting channel
E-mail	compliance-helpdesk@lanxess.com
Post	LANXESS AG Group Function Legal & Compliance Corporate Compliance Kennedyplatz 1 50569 Cologne, Germany
Phone / Online	https://www.speakupfeedback.eu/web/lanxess[3]
Personal meeting	Appointment required

Further reporting channels for LANXESS employees can be found on our compliance intranet site.

Our external whistleblowing platform SpeakUp®[3] is available 24/7. The LANXESS departments can be contacted within the respective working hours.

The submission of reports/complaints via the above-mentioned reporting channels is free of charge.

SpeakUp®[3] is available in over 30 languages. Reports/complaints by e-mail to the Compliance Helpdesk or by post can be made in German or English.

5. What happens after you have submitted your report/complaint?

- Reports/complaints submitted to the above-mentioned reporting channels are processed by the LANXESS Compliance Department. If it is a specific compliance

[3] LANXESS uses the external whistleblowing platform SpeakUp®. On request, reports/complaints can be submitted anonymously and are transmitted to LANXESS in encrypted form. Subsequently, an anonymous dialogue between the whistleblower and LANXESS is possible.

topic, the review is carried out by or in close coordination with the department responsible.

- The receipt of report/complaint submitted to the above-mentioned reporting channels is usually confirmed within one week, provided that appropriate contact details have been submitted.
- Any questions on the matter will be clarified with you if you allow to be contacted by us. An anonymous dialogue is possible via SpeakUp®[3].
- LANXESS strives to conduct the investigation of the report/complaint quickly. The employees of the responsible department(s) therefore work as quickly as possible. Due to the different circumstances, the review period can be very different and can take several days, but in some cases even several months. However, LANXESS endeavors to provide feedback on the status of the investigation after three months at the latest.
- If your report/complaint does not fall within the scope stated herein, you will be informed.

6. How are you protected from discrimination or punishment?

LANXESS does not tolerate discrimination of people who, in a good faith, reported suspected misconduct. This is laid down in our Code of Conduct. The person who provided the report/complaint will be protected in an optimal way against discrimination in the light of the possibilities available to us.

7. Review of the procedure

The effectiveness of the SpeakUp®[3] whistleblower platform and the complaints procedure are reviewed at least once a year and on an ad hoc basis.