

Corporate Due Diligence Obligations in Supply Chains (LkSG): Complaints procedure

Transparent communication with whistleblowers on progress and progress:

1. Incoming complaint* (Compliance Office/Ombudsperson)

- Confirm receipt to whistleblower within 7 days
- Conduct initial plausibility check
- Consultation with the Human Rights Officer if there is an initial indication of a violation of the LkSG

2. In-depth plausibility check (Human Rights Officer))

- In-depth plausibility check if there is an initial presumption of a LkSG violation
- If not LkSG relevant: Compliance Officer reports to whistleblower
- If relevant to the LkSG: Involvement of responsible internal departments, e.g., procurement, environmental protection, security, or human resources, for further processing

3. Processing of the incident (responsible internal department)

- Department specific processing
- Communication of assessment results and, if necessary, joint discussion of the findings with whistleblower by Compliance Officer
- If necessary, consultation with the Human Rights Officer
- If necessary, conduct an event-related risk analysis

4. Develop action plan (responsible internal department)

- Development of an action plan, if possible, considering the whistleblower's perspective
- Consultation and review of the action plan by the Human Rights Officer
- Implementation of measures

5. Closure of the procedure (Compliance Office)

- Review of implementation of the measures
- Notification of the final assessment to the whistleblower (an interim status report is sent after 3 months at the latest)
- Adjustment of the complaint procedure and the measures taken, if necessary.

ca. 6 Monate

All Information and Contacts: [BVG.de/Compliance](https://www.bvg.de/Compliance)

* Complaints / information regarding compliance with the LkSG via the SNB whistleblower system as at: November 2024

