

**Rules of procedure**  
**according to § 8 Abs. 2 - LkSG**  
**Supply Chain Due Diligence Act**  
**for complaints**

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## 1. Introduction

The German Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG) obliges companies in Germany to respect human rights and environmental protection by implementing defined due diligence obligations. These obligations apply to the company's own business operations, to the actions of a contractual partner and to the actions of other (indirect) suppliers.

To implement these requirements, the Finsterwalder family of logistics© group of companies has set up a complaints procedure. This allows any person to report violations or risks relating to human rights or environmental protection that are identified in their own business area or at direct or indirect suppliers.

## 2. Submission of complaints

Complaints can be sent by email to [compliance@finsterwalder.com](mailto:compliance@finsterwalder.com) to the following departments:

Quality Management / Integrated Management Systems Department

Management: Jan Deutschbein

Kontakt: 0345-1228-170

Legal department

Management: Eva Richter

Lawyer (in-house lawyer) for Finsterwalder

Transport & Logistik GmbH; legal advisor

Contact: 08245 9680-810

## 3. Protection of whistleblowers

Complaints are processed impartially, independently and free of instructions and, at the request of the whistleblower, anonymously.

The parties involved in the proceedings are subject to an attorney-client confidentiality obligation in favour of the whistleblower, which only the respective whistleblower may dispose of. This does not apply to the QM department contacting the legal department and vice versa.

A complaint will only be forwarded to the management or other appropriate departments within the company if and to the extent that the whistleblower has authorised the forwarding or if legal violations make this absolutely necessary. The whistleblower can determine that the complaint is passed on in anonymised form without naming their identity.

The whistleblower will not be penalised or disadvantaged as a result of the complaint.

## 4. Submission of a complaint, Initial review

As a rule, the complaint is submitted in writing, unless a verbal notification is made in advance due to imminent danger. The written report is confidential/sealed. In any case, the QM department must carry out an initial review of the complaint. If the complaint is received by the legal department, it is first forwarded to the QM department for an initial review

The whistleblower will receive feedback on the receipt of the complaint within 7 days. The facts of the case will be discussed with the whistleblower, unless the complaint was received anonymously.

## **5. Procedure on receipt of complaint**

The degree of suspicion must be examined taking into account the requirements of the LkSG and the behavioural principles and objectives of section 4. The QM department decides in which suitable form the facts described are to be examined. In case of doubt, a consultation with the legal department will take place. This must always be carried out when human rights violations are reported.

Depending on the test result, the procedure is as follows:

- (1) If the audit does not reveal any indications of a violation of the LkSG, the result of the audit is documented in accordance with data protection requirements. The report and the result of the audit are anonymised and included in the statistics. Reporting on the information is carried out on an annual basis in accordance with Section 10 LkSG.
- (2) If the examination does not reveal any clear indications of a violation of the LkSG, but such a violation cannot be ruled out, the legal department must be informed, which is then responsible for deciding how to proceed.
- (3) If the audit reveals indications of a violation of the LkSG, the QM department immediately informs the legal department, which in turn informs the management after a detailed assessment of the information.
- (4) If the review reveals indications of criminal behaviour by members of the management, the legal department informs a shareholder who is not affected in order to decide on further action.
- (5) In any case, the whistleblower must be informed of the follow-up measures taken within a reasonable period of time, which may not exceed three months.

## **6. Remedial measures**

The QM department, the legal department and the management shall jointly discuss suitable remedial measures in order to remedy the violation of human rights or environmental rights or obligations in their own business area or at a direct supplier or indirect supplier or to eliminate corresponding risks.

## **7. Purpose limitation of personal data**

Personal data collected from a tip-off may only be used to uncover and clarify the facts of the case and to provide feedback to the whistleblower.

### **8. Storage of transactions**

The QM department and the legal department will store digital and analogue documents from their activities in accordance with the rules on the handling of lawyers' files and destroy them after a maximum retention period of ten years.

### **9. Involvement of the data protection officer**

The data protection officer must always be involved in the installation and further development of the complaints procedure.