

Rules of procedure for the complaints procedure of the Dussmann Group in accordance with § 8 of the Supply Chain Due Diligence Act

The Dussmann Group is committed to respecting human rights along the entire value chain. We take responsibility for our employees and take our responsibility to minimize the impact of our business on the environment seriously. As part of our due diligence obligations, the Dussmann Group has established a complaints procedure for reporting human rights and environmental risks and violations of human rights or environmental obligations.

1 Objectives and scope of application

The complaints procedure enables all persons – internal and external – to report human rights or environmental risks and violations arising from the business activities of a Dussmann Group company in its own business or in the supply chain. Information or complaints can be submitted with regard to all risks covered by § 2 (2) and (3) Supply Chain Due Diligence Act.

The human rights risks include in particular:

- Ban on child labor
- Prohibition of forced labor and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association and unionization as well as the right to collective bargaining
- Prohibition of unequal treatment in employment
- Prohibition of withholding an appropriate wage
- Destruction of the natural bases of life through environmental pollution
- Unlawful violation of land rights
- Prohibition of hiring or using private/public security forces that could lead to negative impacts due to lack of instruction or control

Environmental risks include:

- Prohibited production, use or disposal of mercury (Minamata Convention)
- Prohibited production or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally safe handling of waste containing POPs
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention

The complaints procedure serves as an **early warning system** to obtain information on human rights or environmental risks or inadequate preventive and remedial measures as early as possible and to resolve any problems raised before people or the environment get harmed.

The complaints procedure gives individuals or groups of individuals **access to adequate remedies**. They are given the opportunity to report suspected imminent or actual violations of the law so that damage can be averted or minimized immediately.

2 Reporting channels

Information and complaints can be reported confidentially through the [Dussmann Group whistleblower system](#) to the following contacts.

Dussmann Group Compliance

Friedrichstraße 90, 10117 Berlin
+49 30 2025-1047
compliance@dussmanngroup.com

Ombudsman Jesko Trahms

BDO Legal Rechtsanwaltsgesellschaft mbH
Zielstattstraße 40, 81379 München
+49 89 7432-5234
ombudsmann.dussmann@bdolegal.de

3 Process



1. Upon receipt of the complaint or report, the whistleblower receives confirmation of receipt within one week. If contact data are available, the responsible compliance department will remain in contact with the whistleblower throughout the entire process.
2. The complaints or reports are first examined centrally to determine whether the reported issue constitutes a human rights or environmental risk or a violation of human rights or environmental obligations. It is also checked which company or business partner is affected by the report. If the complaint or report is plausible and relevant, an investigation is initiated.
3. Appropriate measures (including measures under labor law and preventive measures) are taken based on the investigation of the complaint or report. If, in the course of the investigation, a violation of human rights and/or environmental obligations is confirmed, remedial measures are initiated immediately. The responsible person follows up on the implementation of remedial measures. The whistleblower will be informed of the outcome of the investigation if there is a means of contacting them.
4. The effectiveness of the complaints process is reviewed regularly and on an ad hoc basis.

4 Confidentiality and protection from retaliation

All information, such as personal data and other information that allows conclusions about the identity of the whistleblower, will be treated confidentially. This also applies after the process has been completed. The persons entrusted with processing the reports are not bound by instructions. They are obliged to maintain confidentiality and handle the information provided by the whistleblower with care. They receive appropriate training and are equipped with sufficient time resources.

The Dussmann Group and its affiliated companies protect whistleblowers from being disadvantaged or penalized because of a complaint. Anonymous reports are also possible.

5 Contact person for the complaints procedure

The contact for the complaints procedure is the Group Compliance department:

compliance@dussmanngroup.com // Phone: +49 30 2025-1047