

# **Policy for the Complaints Procedure under the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)**

**Die Sparkasse Bremen AG**

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## Policy for the Complaints Procedure under the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

This document contains the procedural rules of Die Sparkasse Bremen AG (hereinafter "Sparkasse Bremen") for handling complaints according to the LkSG. The procedural rules describe the complaints procedure established by Sparkasse Bremen for this purpose. The LkSG is available [online](#).

### 1. Informing Person

The complaints procedure allows potentially affected persons to indicate human rights and environmental risks or violations (hereinafter "informing person"). Potentially affected persons are those who

- are affected by economic activities in the business operations of Sparkasse Bremen or
- are directly affected by economic activities of a direct or indirect supplier of Sparkasse Bremen or
- may be injured in a protected legal position
- as well as persons who have knowledge of the possible violation of a protected legal position or an environmental obligation.

### 2. Reporting Channel for a "Notification on the LkSG" on the Website of the Die Sparkasse Bremen AG

The Sparkasse Bremen has set up a button "Notifikation on the LkSG" on its website for a corresponding notification. When clicking the button the relevant information can be provided in text form by the person giving the hint. This text will automatically be forwarded to the complaints office via mail. All complaints can be provided by name or anonymously.

### 3. Complaints Office

The complaints office is the exclusive contact point for the person providing the information during the entire complaints procedure. The complaints office guarantees impartiality and acts independently within the scope of their function and is not bound by instructions.

### 4. Procedure of the Complaints Procedure

#### a. Acknowledgement of the Tip-off

The informing person will receive an e-mail confirmation of their complaint within 5 banking days. If the complaint is made anonymously in a way that makes it impossible to contact the informing person or by (un)deliberately providing false contact information, Sparkasse Bremen is not required to identify the informing person in order to comply with its obligations regarding communication.

#### b. Clarification of Facts and Statement

The complaints office will determine if the reported information falls within the scope of the complaints procedure according to LkSG.

##### (1) rejection of the complaint

If the complaint does not fall within the scope of the complaints procedure, the informing person will receive a corresponding notification within two weeks of receipt of the complaint. As a rule, the informing person will be informed of the reasons for the rejection. An explanation of the reason why Sparkasse Bremen considers the informing person's complaint to be unfounded is not provided if this is not possible due to legal, official or factual reasons preventing the complaints office from doing so.

#### (2) follow-up of the complaint

If the complaint falls within the scope of the complaints procedure, the complaint office shall clarify the facts of the case and, as a rule, issue a statement to the person providing the information within three months. If the investigation of the facts reveals that the information provided by the person making the allegation is not sufficient or not relevant for further clarification of the complaint, the complaints office shall inform the person making the allegation of this and request further information. If necessary, the complaints office will discuss the case with the person making the referral to gain a better understanding of the facts.

#### c. Possible Violation of Law

If the investigation of the complaint reveals that the violation of a LkSG-related duty appears possible, imminent or has occurred in Sparkasse Bremen's own business area or at a direct or indirect supplier, Sparkasse Bremen will initiate appropriate preventive and/or remedial measures. The aim of these measures is to avoid a violation of protected legal positions or to minimize or remedy violations of protected legal positions that have already occurred.

#### d. Review of Effectiveness and Adjustment

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis.

### 5. Documentation

The respective complaint process is documented and retained in accordance with legal requirements.

### 6. Data Protection and Confidentiality

Sparkasse Bremen takes appropriate personnel, organizational and technical measures to ensure that the confidentiality of the identity of the informing person is maintained in the case of incoming complaints. An effective protection against discrimination or punishment of the informing person is guaranteed. The employees of the complaints office are obliged to maintain confidentiality and to comply with data protection regulations. Confidentiality relates to the informing person, the person(s) who is/are the subject of the complaint and other persons named in the complaint.

### 7. Costs

The procedure is free of charge for the informing person.