

Description of the Complaints Procedure at DEUFOL

Rules of Procedure for Complaints (§§ 8 f. LkSG)

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These rules of procedure apply to DEUFOL SE or a company affiliated with DEUFOL SE in accordance with §§ 15 et seq. AktG (hereinafter referred to as DEUFOL) and describe the procedure to submit internal and external reports on human rights and environment-related risks or violations of human rights-related or environment-related obligations arising from the economic activities of DEUFOL in its own business area or a direct supplier in accordance with the German Supply Chain Due Diligence Act (hereinafter referred to as LkSG).

1. Who can submit complaints

The Complaints and Reporting Procedure is available to anyone who identifies risks or violations relating to human rights or the environment within DEUFOL or its supply chain. Participating parties can be employees as well as individuals and organisations outside DEUFOL.

2. Where can complaints be submitted

Complaints must be submitted via our digital, multilingual whistleblowing platform. All further communications relating to the complaint will take place within this tool.

Deufol Whistleblowing platform SpeakUP:

<https://deufol.speakup.report/DeufolBeschwerdesystem>

We recommend using the “5 W’s” when submitting a complaint:

1. What is the specific offence or risk – the more detail, the better
2. Where is the problem taking place? In which countries or regions?
3. When did this take place or when was it identified? Is the offence still ongoing?
4. Why is it important to report this offence? What is the impact on humans and the environment?
5. Who committed the offence or is responsible for the risk and who are the involved people, companies or organisations?

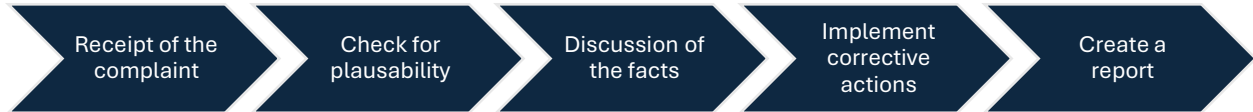
3. What can be reported

You can report any human rights or environment-related risks or violations of duty.

Reports should be as specific and comprehensible as possible. That way we have enough information as a starting point for further internal investigations or a basis for further action. Fundamentally, it is always possible to use the Whistleblowing platform entirely anonymous.

4. Complaints procedure

All submitted information or complaints are handled following a pre-defined process:



1. Receipt of the complaint / notification. The receipt is confirmed.

Note: When submitting a report to 'SpeakUp', the informant receives a report number, which should be noted down. A password must also be set so that the informant can log into the secure portal at any time and communicate with us. If desired, an e-mail can also be specified in order to receive e-mail notifications about the status of the complaint.

2. The details of the case will be clarified with the informant and DEUFOL will check the report for plausibility and whether it falls within the scope of the LkSG. If this is not the case or if the plausibility is not confirmed, the informant receives notice in the DEUFOL Speak Up whistleblowing system with reasons for closing the report. With that, the process is completed.
3. If DEUFOL recognises a risk or a breach of duty that falls within the LkSG, the facts of the case are discussed, and corrective measures are developed to eliminate the breach or risk in the long term. Depending on the content of the report, it may be necessary to involve experts from other DEUFOL departments (e.g. Purchasing, Legal Department, Data Protection). If the complainant is personally affected, the measures can also be discussed with them.
4. The measure is implemented, and its effectiveness is reviewed in an appropriate manner.
5. Finally, a report on the results of the investigation is written and kept for seven years. This is shared with the informant and the relevant stakeholders for the case in question.

If several complaints are received at the same time, more serious breaches of duty will be prioritised.

For persons affected by reports, the presumption of innocence applies until the offence has been proven.

5. Contact person

The central Human Rights Officers of DEUFOL SE are responsible for all information and complaints.

Contact: Holger Hartmann / Ronja Tangl

E-mail: lksg@deufol.com (Please only use Speak Up for communication about reports)

Depending on the report, other internal departments or external consultants may be consulted during the resolution of the offence or risk.

6. Data protection and confidentiality

By using a whistleblower system with restricted access, DEUFOL ensures that the confidentiality of the identity of informants is protected when complaints and reports are received. Effective protection against discrimination or penalisation on the basis of an informant's complaint is guaranteed. The information and data contained in the complaint and all communication relating to it is protected and secured.

The persons entrusted with the complaints procedure are obliged to maintain confidentiality and comply with data protection regulations. Confidentiality applies to the informant, the person(s) who is/are the subject of the report and other persons named in the report.

Personal data will be deleted once the purpose has been achieved, or alternatively when there is no longer a legitimate interest. However, at the earliest after expiry of the statutory retention and proof obligations.

[SpeakUp privacy policy](#)

7. Costs

The procedure is free of charge for informants.

8. Review of effectiveness

The procedure is subject to an annual review of effectiveness. It will also be reviewed if there is additional cause to do so.

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