

Rules of procedure for the complaints mechanism under the German Supply Chain Due Diligence Act

General information The companies (1) of the LEIPA Group actively implement the requirements of the German Supply Chain Due Diligence Act (LkSG) so that compliance with human rights and environmental standards can be adequately guaranteed in our supply chains and in our own business operations. Section 8 of the LkSG requires the establishment of a complaints mechanism. The mechanism enables internal and external persons to report human rights and environmental risks and violations of human rights or environmental obligations. The specific details and procedures of this complaints mechanism at the LEIPA Group are set out in these rules of procedure in accordance with the LkSG.

1 LEIPA Georg Leinfelder GmbH, LEIPA Solid Board GmbH i.G., LEIPA Flexibles GmbH i.G., LEIPA Logistik GmbH, MAD Recycling GmbH and all foreign companies and investments

Who can report and what can be reported?

In principle, every person is entitled to report complaints or information within the meaning of the LkSG.

Human rights and environmental risks and violations of human rights or environmental obligations in the company's own business area and in the supply chain can be reported. These include in particular:

- Slavery
- Economic exploitation
- Forced or child labour
- Disregard for occupational health and safety and work-related health hazards
- Disregard of the freedom of association
- Unjustified unequal treatment in the employment relationship
- Violation of minimum wage regulations
- Destruction of the natural basis of life through environmental pollution
- Unlawful violation of land rights
- Commissioning or use of private or public security forces in violation of human rights
- Other actions or omissions in breach of duty that seriously impair protected legal positions
- Disregard of environmental protection bans (Minamata-Convention¹, POPs-Convention², Basler-Covention³)

¹ [Minamata-Convention](#)

² [POPs-Convention](#)

³ [Basler-Convention](#)

What complaint channels are available?

You can use our complaints platform to submit complaints or information. This can be reached via the following link:

[sicher-melden.de/icm52092 leipa group gmbh](https://sicher-melden.de/icm52092_leipa_group_gmbh)

Use is free of charge for whistleblowers. In addition to the internal announcement, the complaints channel can also be accessed via the link published on our website. The LEIPA Group uses the Otris complaints platform, which is ISO27001 certified and operated exclusively in German data centres, as an internal complaints channel. SONNTAG IT-Solutions acts as the person entrusted with the complaints procedure by accepting the reports submitted via the Otris complaints platform as a neutral body and getting in touch with the LEIPA Group's contact persons.

How does a complaints procedure work?

After submitting a report or complaint:

- (1) The Reporting Centre shall confirm receipt of a report to the whistleblower within seven days at the latest,
- (2) the Reporting Centre shall check whether the reported violation falls within the material scope of the LkSG; in the event of a rejection, the whistleblower shall receive a statement of reasons,
- (3) the Reporting Centre shall maintain contact with the whistleblower and inform them of the expected timeline of the complaints procedure and their rights with regard to protection from discrimination or punishment,
- (4) the Reporting Centre examines the validity of the report received; if necessary, the whistleblower is offered an amicable dispute resolution procedure at this point,
- (5) if necessary, the Reporting Centre requests further information from the reporting person and works with the reporting person to develop proposals for follow-up measures as described in the LkSG, and
- (6) the reporting office takes appropriate follow-up measures and
- (7) assesses the result achieved with the reporting person.

There is generally a seven-year retention period for incoming reports.

Effectiveness of the complaints procedure

The effectiveness of the complaints mechanism is reviewed at least once a year or on an ad hoc basis. Evaluations from the information received to date and the subsequent procedures as well as from regular analyses are incorporated for the purposes of improvement and prevention. The BAFA guidelines on the complaints mechanism are taken into account.

Protection of anonymity and against discrimination/
Punishment due to a complaint

It is possible to submit a report or complaint anonymously via Otris. The technical anonymity of the whistleblower is guaranteed by the complaint channel. The identity of the whistleblower cannot be traced by technical means. The confidentiality of the whistleblower's identity is also guaranteed in the case of non-anonymous submission of information or reports. All data protection regulations, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG), apply to the processing of personal data by reporting centres. The complaints channel also acts impartially and is therefore independent and not bound by any instructions from the LEIPA Group. Persons providing information may not be personally or legally penalised or punished because of a report or complaint.