



# Rules of procedure for the complaints procedure in accordance with § 8 Supply Chain Due Diligence Act (LkSG) of BPW Bergische Achsen KG

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## 1. To whom does the complaints procedure apply?

The complaints procedure is designed for external and internal whistleblowers. The BPW Bergische Achsen KG (BPW) complaints procedure is available to directly as well as indirectly affected parties, such as:

- Employees of BPW-Group
- Employees of indirect and direct suppliers
- Business partners
- Trade unions and non-governmental organizations
- Other third parties, such as residents

## 2. For what kind of information can the complaints procedure be used?

The complaints procedure can be used for all human rights or environmental risks and breaches of duty that are anchored in the LkSG and have arisen because of business activities in the company's own business unit or along the supply chain.

## 3. What channels can be used to submit complaints?

In order to give as many people as possible access to the complaints procedure, the following complaint channels are available.

a) Complaints can be submitted via the online **whistleblower system "trusty"**, which can be accessed at <https://bpw.trusty.report/>. The portal is free of charge and can be used at any time. The submission of the complaint as well as the communication can be done anonymously. The portal is available in various languages, e.g. German, English, Spanish and French.

b) In addition to the whistleblower system, hints can be submitted under +49 2262 78 1237 or via [verhaltenskodex@bpw.de](mailto:verhaltenskodex@bpw.de).

## 4. How does the complaints procedure work?

Once the complaint has been submitted, the person submitting the complaint will receive confirmation of receipt within seven days, together with the name of a contact person at BPW. The hint is first checked whether it is a legal violation of the LkSG or of other BPW guidelines. If this is the case, the hint is reviewed regarding factual and substantiated indications.



During the review, the whistleblower will be involved and asked to be available for questions to be able to present the facts as concretely as possible. The person providing the information can decide whether he or she wishes to remain anonymous or make himself or herself available with a clear name.

If there is not enough information available to process the complaint even though the whistleblower has been involved and third-party sources of information have been consulted, the complaint will not be accepted and the whistleblower will be informed of this and reasons will be given.

If the review reveals a human rights or environmental breach of duty under the LkSG, appropriate remedial action will be developed. The whistleblower team monitors compliance with the measures and the whistleblower is informed of the results of the process.

Regardless of whether the hint is followed up, the whistleblower will receive feedback regarding the progress of the process three months after receipt of the hint. If the tip is not followed up, a statement of reasons must be sent to the whistleblower.

Ongoing complaints and the complaints procedure are reviewed for effectiveness annually and on an ad hoc basis. Feedback from the whistleblowers is used for evaluation.

## **5. Who deals with the complaint?**

Reports under the LkSG are processed by a whistleblower team. The team comprises people from the legal, HR and purchasing departments to ensure impartial action. The team is trained in the LkSG and the complaints procedure, is sworn to secrecy and has sufficient time at its disposal. The complaints officer is not bound by instructions within the framework of the procedure.

## **6. How are whistleblowers protected?**

Whistleblowers who report in good faith are protected from discrimination and punishment. BPW will protect the identity. Protection against reprisals is ensured by appropriate measures, such as the use of secure communication channels, relocation, involvement of the authorities or the use of external meeting rooms.

If the whistleblower experiences retaliation, he or she should immediately contact the BPW complaint contact. BPW will investigate the situation and develop measures on an individual basis.

Individuals who knowingly submit a false report cannot be afforded this protection.



## 7. What information is needed?

The following voluntary information can help to process the complaint better. All information provided will be treated confidentially and is subject to the data protection guidelines:

- **Contact information:** Name and contact information of the person providing the information or the affected person.
- **Employer and place of work:** Name of the business partner or department involved and if different, your employer; specific information to identify the location of the workplace to which the complaint relates.
- **Alleged violation:** Description of the facts with date/time and, as specific as possible, information about the course of the possible breach of duty.
- **Scope:** How many persons are affected? How serious is the breach of duty? How frequently does the breach of duty occur?
- **Parallel proceedings:** Has a complaint already been filed with the affected company or are other organizations aware of the complaint?
- **History:** Has the complaint already been communicated to BPW or other organizations in the past?
- **Perspective of affected parties:** What action would the whistleblower or affected parties take to remedy the situation?

The more detailed the report, the more likely BPW will investigate the improper activity. If the whistleblower has files, documents, pictures, etc. that support the suspicion, it is desirable to attach them to the report.