

# **Code of Procedure: Information on the Complaints Process under the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)**

## **1. Purpose and Scope**

As of January 1, 2024, Otto Krahn Group falls into the scope of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), regulating corporate due diligence obligations to prevent human rights violations in supply chains. The main goal of this law is to enhance the protection of human rights and the environment. Companies are now required to take appropriate measures to comply with human rights and environmental due diligence in their supply chains. The supply chain, as defined by the LkSG, encompasses all products and services of a company, including all steps taken domestically and abroad that are necessary for the production of products and the provision of services. This includes the actions of the company within its own business area, a direct supplier, as well as an indirect supplier.

## **2. Complaint Procedures**

The Otto Krahn Group provides the opportunity for individuals to report risks related to human rights and environmental aspects that may arise from economic activities along the supply chain within its own business area or that of a direct or indirect supplier. This means that both internal employees and external individuals, such as supplier employees and third parties, can bring attention to violations and risks.

The complaint procedure you have chosen is designed to address complaints alleging violations of protected legal positions according to the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) or associated risks in the areas of human rights or the environment.

We aim to effectively protect all whistleblowers and offer a secure communication platform for the submission of anonymous reports using the following link:

**<https://www.bkms-system.com/ottokrahn>**

## **3. Handling of complaints**

Upon submitting a report, we will initially send you a confirmation email or message via the secure anonymous communication platform. In the next step, a check will be conducted to determine the plausibility of your signal and whether it falls within the scope of the complaint procedure according to the LkSG. If the scope of the complaint procedure is applicable and you agree to further communication, we will schedule an appointment with you. Communication through the medium will adhere to this procedure for the complaint process under LkSG. Various other communication methods may be utilized, such as in-person or virtual meetings or email communication.

Our goal is to jointly clarify the circumstances as thoroughly as possible and offer a mutually agreeable solution that aligns with your interests. To prevent further violations of the LkSG or associated risks, appropriate measures will be developed. **The Otto Krahn Group** will conduct further necessary investigations and initiate appropriate steps.

If we determine that the scope of the LkSG is not applicable, you will receive a corresponding explanation to which you can, of course, provide your own perspective.

#### **4. Contact Persons**

Our Compliance Team can be reached through the central mailbox: **[compliance@ottokrahn.group](mailto:compliance@ottokrahn.group)**

#### **5. Protection of Whistleblowers**

You can trust that we will treat your identity, unless it is an anonymous report anyway, confidentially and in accordance with data protection regulations, upon request, to ensure effective protection against discrimination and reprisals. **The Otto Krahn Group** does not tolerate any discrimination against whistleblowers. The discussion appointment will exclusively take place with the individuals responsible for the complaint procedure to provide you with sufficient protection. If necessary, additional individuals may be involved with your consent. Your contact persons are bound by confidentiality and treat your data accordingly.