

Rules of Procedure

Complaint procedure (Section 8 LkSG (Lieferkettensorgfaltspflichtengesetz – Supply Chain Due Diligence Act))

Valid from: June 7, 2023

1. Field of application

Information of violations of human rights and/or environmental laws and regulations as well as information on any other violations related to economic crime and information security within the Brand Group and at direct suppliers may be reported to the Brand Group (“BRAND”) according to these Rules of Procedure.

2. Responsibilities and contact persons

The contact person and representative for the complaints procedure is the compliance service provider Hinweisgeberexperte (Compliance Beratung + Service GmbH).

Hinweisgeberexperte can be contacted via the following complaint channels:

Reporting platform/online form:

<https://brandsupplychain.hinweisgeberexpertemeldeplattform.de/en>

E-Mail: info@hinweisgeberexperte.de.

Post: Compliance Beratung + Service GmbH, Hinweismanagement Beschwerdeverfahren, Maximilianstr. 24, 80539 München, Germany

Complaints are received by our representative and handled by the relevant employees within the Brand Group (if required, with the support of other subject matter experts).

3. Sequence of the complaint procedure

Reporting

The person reporting the information should formulate this as specific as possible answering the 5W's in particular:

- Who? – Who is it about? Who is affected?
- What? – What has happened? Description of the facts

- When? – When did the incident occur?
- How? – How many times did it happen?
- Where? – Where did the incident take place?

Complaints are received by our representative. The person providing the information receives an acknowledgment of receipt and is informed about the next steps and the time schedule.

Verification of the information

First, an initial assessment is conducted by our representative in order to determine whether the reported violation falls within the scope of the complaint procedure. Further requirements for initiating a clarification of the facts are that the event described is assessed as plausible and fundamentally possible and could mean a violation of a law or a serious violation of an internal rule. In this context, it is also examined whether the data are collected, processed, and used in accordance with data protection law in the course of the investigation.

The aim of the investigation is the neutral, qualified, and objective clarification of the facts that are the subject of the information provided. The facts are clarified by appropriately trained/professionally suitable persons who are independent and bound to secrecy.

They will keep in touch with the person providing the information, check the validity of the report received, and, if necessary, ask the person providing the information for further information. Any information on violations at direct suppliers will be investigated together with these persons insofar as this is reasonable and appropriate.

The examination is carried out on the basis of documents and interviews and is documented in a comprehensible manner in a case file.

Completion

The person providing the information will receive feedback on the progress of the procedure within three months of the confirmation of receipt. A report shall be made only to the extent that it does not affect internal investigations and does not compromise the rights of the persons who are the subject of a report and/or who are named in the report.

Each case concludes with a final written report, which is strictly confidential. Information is passed on only to the extent necessary and permissible under data protection law and according to the type and severity of the violations identified.

The final report contains sanctions and appropriate measures to remedy the shortcomings and prevent similar violations. After the investigation is completed, the person who provided the information will receive feedback on follow-up actions insofar as this is legally permissible.

Case files for which there is no legitimate interest in retention are deleted once a year.

4. Protection against discrimination and punishment based on a complaint

The person providing the information in good faith in order to expose wrongdoing enjoy special protection. Our representative and the internally responsible employees within the Brand Group ensure that the person providing information is protected by maintaining confidentiality and, where legally possible, by ensuring their anonymity. This means that the identity of the person providing information is known only to persons who are responsible for receiving and examining information or for taking follow-up action.

Through the complaints procedure, the Brand Group ensures that persons providing information who have reasonable grounds to believe that their information is true, are not impeded, restricted, or influenced in delivering their information.

Persons known by name, providing information, do not have to fear any disadvantages such as the withdrawal of orders, terminations, discrimination, or similar retaliatory measures after providing information.

5. Invalid reports

It is expressly not permissible to provide information that accuses third parties or employees with malicious intent and against their better knowledge. Such information, which is obviously intended exclusively to harm, denounce, or disparage other persons, shall not be processed. In such cases, the person providing the information shall not enjoy any special protection against discrimination and may also be held liable.