



DKV MOBILITY GROUP

Complaints Procedure

According to German Supply Chain Act

Status	January 2024
Document Owner	Group Compliance Office
Language version	EN

The DKV MOBILITY GROUP is aware of its social, ethical and environmental responsibility in our company and the entire supply chain. Accordingly, we have set up an effective complaints procedure through which information on human rights and environmental risks or violations of human rights and environmental obligations can be reported. To protect confidentiality, the complaints procedure can also be used anonymously. The Group Compliance Office of the DKV MOBILITY GROUP is responsible for the complaints procedure.



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1 Introduction

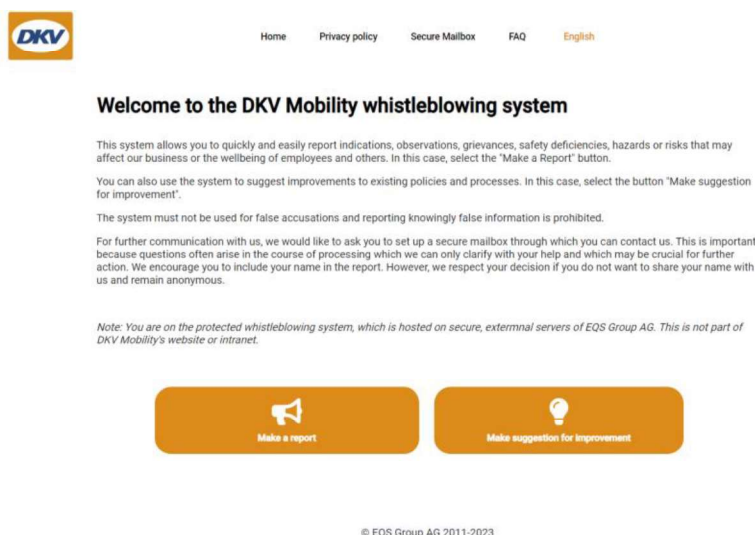
Applies to all whistleblowers, who wish to draw attention to human rights and environmental risks and violations of human rights and environmental obligations that have arisen or could arise in our business or along our supply chain.

In addition to the tried-and-tested contact channels, we have set up a complaints procedure, a platform that can be used to provide information online. The information is recorded in a transparent process that safeguards the legitimate interests of all parties involved in the best possible way. Reports are processed, stored and archived with the necessary confidentiality.

The complaints procedure is intended to offer the greatest possible protection for both whistleblowers and those affected. Investigations are only initiated after a careful preliminary review and if there are substantiated indications of a violation. Investigations are conducted in a confidential manner. The information is processed as part of a fair, fast and confidential process. Investigations are coordinated by the Group Compliance Office.

2 Complaints channels

- electronic whistleblowing system dkv-mobility.com/en/whistleblowing-system/



The screenshot shows the DKV Mobility whistleblowing system interface. At the top left is the DKV logo. To its right are navigation links: Home, Privacy policy, Secure Mailbox, FAQ, and English. Below the navigation is the heading "Welcome to the DKV Mobility whistleblowing system". The main content area contains three paragraphs of text explaining the system's purpose and usage. At the bottom, there are two orange buttons: "Make a report" (with a megaphone icon) and "Make suggestion for improvement" (with a lightbulb icon). A copyright notice "© EQS Group AG 2011-2023" is located at the bottom center.

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3 Complaints procedure

3.1 Report complaint

Complaints can be reported via the channels described under paragraph 2. The person making the report will usually receive a confirmation of receipt within 7 days.

If complaints are submitted via internal DKV bodies (e.g. supervisor, works council), the respective recipients are obliged to inform the Group Compliance Office. The Group Compliance Office subsequently records the complaint in the electronic complaints system. This ensures that all processes are documented in a traceable manner.

3.2 Check complaint

At the beginning of the complaints procedure, the Group Compliance Office checks whether the complaint falls within the scope of the statutory regulations. If this is not the case, the person making the complaint receives feedback with reasons.

3.3 Discuss the facts

The Group Compliance Office coordinates further steps to clarify the facts. If it is not possible to clarify the facts of the case due to a lack of information, the Group Compliance Office will contact the whistleblower to obtain further information.

The facts of the case are then discussed with the whistleblower in order to improve understanding of the complaint. Based on this, a possible solution can be worked out later. As part of the clarification process, the expectation for any preventative or remedial measures is discussed with the whistleblower.

The Group Compliance Office has the right to involve other internal departments (e.g. Internal Audit, Human Resources) for support and/or information purposes during investigations.

3.4 Track implementation

The Group Compliance Office prepares a final report on the conclusion of the investigation, stating the facts of the case and the existence or non-existence of a violation or risk. If the final report determines that a violation of human rights and/or environmental obligations has occurred or is currently occurring or is imminent, remedial measures are initiated or implemented.

The effectiveness of the corrective measures is reviewed and documented by the Group Compliance Office. If necessary, adjustments are made to the remedial measures.

3.5 Give feedback

The whistleblower will receive feedback from the Group Compliance Office no later than 3 months after submitting the complaint.

3.6 Settle the complaint amicably

Optionally, the whistleblower can be offered a procedure to settle the complaint amicably (e.g. mediation, conciliation or internal arbitration). In this process, the parties involved attempt to find an amicable solution together with the help of a neutral and mediating third party. The focus here is on solution-oriented cooperation and the development of remedial or preventative measures.

However, this requires that the identity of the person providing the information is known or that the person providing the information waives anonymity.

4 Confidentiality and impartiality

The complaints procedure guarantees the confidentiality of the whistleblower and any person(s) concerned as well as the protection of their personal data. We therefore recommend the use of the (anonymous) secure mailbox function.

Anyone who treats a whistleblower in a derogatory manner or discriminates against them in connection with the submission of a complaint, uses the complaints procedure as a platform for frivolous accusations or an outlet for personal anger, deliberately and maliciously makes false statements or discredits or defames others is in breach of their (employment) law obligations. Threatening or attempting to take reprisals is also prohibited. Such misconduct will be prosecuted with the utmost severity.