

## Complaints procedure according to § 8 Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

### *Bergfreunde GmbH*

Sustainable business practices create future perspectives for the environment, society and the economy, and also for each individual employee or business partner of Bergfreunde GmbH.

The pillars of Bergfreunde culture are the division of central requirements and their independent implementation and management, as well as a shared understanding of values and risk minimization for sustainable corporate development.

The whistleblowing system with the legal expertise of [Ratisbona Compliance GmbH](#) generates additional trust and security by means of a clearly defined structure accessible to everyone as well as the legally based initial assessment, thus ensuring the sustainable success of Bergfreunde GmbH and prevent damage.

## Code of Procedure Complaints procedure according to § 8 Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

Bergfreunde GmbH takes responsibility for respecting and strengthening internationally accepted human rights within its own business units and through appropriate management of its supply chains. Bergfreunde GmbH implements and complies with the requirements of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) for the fulfillment of human rights and environmental due diligence obligations. An essential core element of these due diligence obligations is the establishment of an effective complaints procedure through which notifications of human rights and environmental risks or violations can be made. These rules of procedure provide information on the main features of the complaints procedure, how to access the procedure or how to reach it, and the responsibilities. Furthermore, it also provides information on what happens with incoming notices and complaints, i.e. how the complaints procedure is carried out. It is important to Bergfreunde GmbH to present this information in an understandable and comprehensible manner and to create the greatest possible transparency about the process.

### What is the purpose of the complaints procedure?

The complaints procedure is intended to offer any person or group of persons the opportunity to submit relevant complaints or information to Bergfreunde GmbH and thus to draw attention to human rights and environmental risks (early warning system).

However, persons or groups of persons are also given the opportunity to provide information about suspected violations of the law so that damage can be averted or minimized immediately (access to appropriate remedy).

### Who is the complaints procedure addressed to? Who can submit complaints or notices?

Any person can submit complaints and notices, regardless of whether this is done in Germany or abroad.



### What types of notices or complaints can be submitted?

The complaints procedure enables individuals to point out human rights and environmental risks as well as violations of human rights or environmental obligations that have been caused by the economic actions of Bergfreunde GmbH in their own business operations or in the supply chain.

### How can I submit complaints or notices?

Complaints and notices can be submitted at any time in three different ways. All complaints and notices, regardless of the way they are received by Bergfreunde GmbH, will be processed immediately and in the same manner.

Bergfreunde GmbH provides the digital whistleblower system with legal expertise of [Ratisbona Compliance GmbH](#) ("RC-Supply Chain"), through which complaints or tips can be submitted anonymously. This use is possible in up to 60 languages.

The whistleblowing system can be reached at:

<https://ratisbona-compliance.de/en/start-lksg/>



### ELECTRONIC REPORT



Before submitting your notice through our system, please read the:  
<https://ratisbona-compliance.de/datenschutzerklaerung-fuer-hinweisgeber/>

By clicking on the button below, which leads to the input mask of the whistleblower system, you confirm that you have taken note of the privacy policy information.

Would you like to submit your report **electronically**? Please scan the QR-Code.



### REPORT BY PHONE



Would you like to submit your report **by phone**? You can reach the team of Dr. Erich J. Beer at:  
[+49 941 2060384-2](tel:+4994120603842)

### POSTAL CONTACT



Would you like to submit a report by mail?

Contact us::  
Ratisbona Compliance GmbH  
Trothengasse 5  
93047 Regensburg

The 3 channels ensure the confidentiality of the reports. The system enables the creation of a mailbox through which the person submitting the report can communicate with the Bergfreunde GmbH and its subsidiaries under confidentiality of his identity.

### Who handles the complaints and notices?

Complaints or tips are processed by the Ratisbona Compliance team, consisting of experienced lawyers and compliance experts. Both the process of submitting a notice and the subsequent evaluation and processing are based on extensive expertise and years of experience. See also: <https://ratisbona-compliance.de/ueber-uns/>

The Ratisbona Compliance team has the following qualities:

- Impartial
- Independent
- Not bound by instructions
- Committed to secrecy
- Appropriately qualified
- Fast response time

### What is the complaint procedure?

- After a complaint or notice is received, the person making the notice receives an acknowledgement.
- This confirmation of receipt is sent within 7 days.
- During the entire procedure, Ratisbona Compliance is in contact with the person providing the information, if requested.
- The complaints or reports are examined to determine whether the reported facts constitute a human rights or environmental risk or a violation of human rights or environmental obligations. In the process, it is also checked which company or supplier, etc. is affected by the report. Subsequently, the complaint or notice is transferred to the responsible body.
- The next step is to clarify the facts, which is generally done within three months. If, in the course of clarifying the facts, it is determined that a violation of human rights and/or environmental obligations is imminent or already taking place, remedial measures are initiated without delay.
- The body responsible for the complaints procedure follows up on whether and to what extent the remedial measures are implemented.
- Otherwise, a proposal for further action is drawn up on the basis of the findings of the clarification of the facts.

## How are reporting persons protected from disadvantage and reprisals as a result of a complaint or report?

The protection of persons providing information from disadvantage or punishment as a result of complaints made or information provided is an important part of the complaints procedure of Bergfreunde GmbH.

The following measures are in place to protect the person submitting the notice:

- All complaints and notices are handled exclusively by a team of experienced attorneys and compliance experts.
- All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, is treated confidentially. This also applies after the conclusion of the proceedings.
- In accordance with legal requirements, the documentation is retained for the duration of the statutory retention period.

Bergfreunde GmbH protects persons who provide information from being disadvantaged or penalized as a result of a complaint.

## QR Codes in additional colors

