

## **Rules of procedure for the complaints procedure pursuant to Section 8 of the Supply Chain Due Diligence Act (“Lieferkettensorgfaltspflichtengesetz” – LkSG)**

As of 05/25

### **1. What is the purpose of the complaints procedure? What types of complaints and information can be submitted?**

The complaints procedure is intended to provide an opportunity to draw attention to human rights-related or environmental risks as well as to violations of human rights-related or environmental obligations that have arisen as a result of the UFZ's business activities in its own business area or by direct or indirect suppliers of the UFZ.

### **2. Who can submit complaints or reports?**

Anyone can submit complaints and reports.

### **3. How can complaints or comments be submitted?**

The UFZ has opted for a complaints procedure via an external contact point and has expanded its electronic whistleblower system in accordance with the Whistleblower Protection Act to include the requirements of the LkSG.

Person who want to submit a complaint or report can contact Dr. David Albrecht and Sophia Hoffmeister from the law firm FS-PP Berlin - Frank Auffermann Vogel Albrecht - Partnerschaft von Rechtsanwälten mbB, Potsdamer Platz 8, 10117 Berlin, Germany, who have been appointed by the UFZ as lawyers of trust. The contact details and access to the digital whistleblowing system can be found at: <https://fachanwaelte-strafrecht-potsdamer-platz.de/de/compliance/compliance-meldestelle/unternehmen-organisationen/helmholtz-zentrum-fuer-umweltforschung-ufz>.

The digital whistleblower system enables both our employees and third parties to report violations in our own business area and at our direct and indirect suppliers.

Anonymous complaints or reports can also be submitted. Anonymous communication with the persons who submitted the complaint or report can be realized at their request.

The lawyers of trust are impartial, independent and not bound by instructions with regard to the examination of the reported complaints and information and are obliged to maintain confidentiality. The complaints and reports received are always treated confidentially and, if desired, anonymously.

### **4. What happens after a complaint or report is received?**

The lawyers of trust check whether the complaints and reports received in the digital whistleblower system are covered by the scope of the LkSG and, if so, forward them to the UFZ for further processing. If the scope of the LkSG does not apply, the person who submitted the complaint or report will be notified with reasons.

If a violation of human rights or environmental obligations at the UFZ is imminent or has already occurred, the management will be informed immediately and appropriate remedial measures will be taken to prevent the violation or end it as quickly as possible.

We investigate indications of violations at our indirect suppliers in cooperation with our business partners and take the necessary measures depending on the severity of the violation.

**Procedure in detail:**Step 1:

The person who submitted the complaint/report will automatically receive confirmation that it has been received.

Step 2:

The lawyers of trust check whether the complaint or the subject of the report received falls within the scope of the complaints procedure.

If the LkSG is applicable, the complaint or report will be forwarded to the UFZ.

If the LkSG is not applicable, the person who submitted the complaint or report will be notified, including a brief explanation.

Step 3:

If necessary, the UFZ will contact the person who submitted the complaint or report (unless the complaint or report was received anonymously).

Step 4:

A committee will discuss the matter and follow up on the complaint or report in accordance with the law and internal regulations.

Step 5:

The UFZ undertakes the legal assessment, if necessary with the help of external assistance, and determines suitable measures to remedy the infringing practices.

Step 6:

The person who submitted the complaint or report will be informed of the result at the latest after implementation within the scope of what is legally permissible, provided they have given their consent to being contacted again.

The effectiveness of the procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments are made to the procedure or the corrective measures implemented.

**5. How are persons who submitted a complaint or report protected against discrimination and reprisals on the basis of a complaint?**

The protection of persons who submit a complaint or report from discrimination or punishment on the basis of complaints is an important part of the complaints procedure. All information and documents provided to the UFZ are treated in strict confidence and in compliance with the relevant data protection regulations. The confidentiality of the identity of the persons who submitted a complaint or report is fully protected. Effective protection against discrimination or punishment of persons who submitted a complaint or report on the basis of a complaint is guaranteed.