

Procedure for the Complaints Process according to § 8 of the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG)

Preamble

With the new law on corporate due diligence in supply chain to prevent human rights violations in supply chains (Supply Chain Due Diligence Act - LkSG), we are obliged to appropriately consider human rights and environmental due diligence in our own business area and service chains. According to § 8 I LkSG we are required to establish a complaint procedure in accordance with the requirements of the law. For this purpose, we have chosen an external complaint and whistle-blower portal as described below. This complaint procedure allows our employees and external individuals to report human rights and environmental risks as well as violations of corporate due diligence obligations.

This procedure provides an overview of the complaint process, communication channels, and the procedure for reviewing a complaint under the Supply Chain Due Diligence Act.

Who we are

AWO Nordhessen provides social services for people and acts in accordance with its core values: freedom, justice, tolerance, and solidarity. The new Supply Chain Due Diligence Act (LkSG) came into effect on January 1st, 2023. AWO Nordhessen falls within the scope of this law on January 1st, 2024.

You can now submit your complaints through our complaint and whistle-blower portal.

We consider the established complaint procedure as an opportunity to recognize challenges with your help by identifying human rights and environmental risks or violations, preventing them through our preventive measures, and resolving them as quickly as possible through the corrective measures derived by us.

Confidentiality Protection and Communication Channels

Our complaint procedure is accessible to all individuals through various communication channels (email, reporting portal, telephone, and mail). You can report violations of the due diligence obligations of the LkSG, if desired, anonymously.

Our complaint and whistle-blower portal protects your identity and the identity of individuals mentioned in the complaint. We handle information about the complaint subject with care and only disclose it to individuals necessary for processing your complaint. The LkSG does not provide an exception to the confidentiality requirement; however, there is no confidentiality protection for abusive reports.

The reporting office is operated by our externally appointed ombudsperson. Below are the communication channels for submitting your report in detail:

Website Complaint and Whistle-blower Portal

<https://awo-nordhessen.ak-compliance.de>

Reporting Office

AWO gemeinnützige Gesellschaft für soziale Einrichtungen

c/o Althammer & Kill GmbH & Co. KG

Roscherstraße 7

30161 Hannover

Phone: +49 511 330603-70

awo-nordhessen@ak-compliance.de

Ombudsperson

Niels Kill

Althammer & Kill GmbH & Co. KG

Phone: +49 511 330603-70

awo-nordhessen@ak-compliance.de

Your personal data will be processed in accordance with the General Data Protection Regulation - GDPR (Datenschutz-Grundverordnung - DSGVO).

Processing of Your Complaint

- I. The complaint can be submitted through the contact channels mentioned above.
- II. You will receive a written confirmation within 7 days of receiving the report. This time is needed to assess whether the reported information falls within the scope of the LkSG (§§2 II and 2 III) and contains sufficient information.
- III. If required, we will contact you and request further information.
- IV. Within three months, we will inform you of the measures taken in response. We consider potential conflicts of interest and, as far as possible, attempt to involve you in the process of deriving corrective measures.
- V. Insights gained from the situation support us in the continuous improvement process.

If your complaint is unrelated to the Supply Chain Act, you will receive corresponding feedback from our external reporting office. There will be no further processing by our LkSG team.

At this point, we would like to emphasize that a complaint based on suspicion is also permissible. We rely on your observations and do not expect hearsay in your reports on human rights and environmental risks and potential violations.

Costs

The use of the complaint and whistle-blower portal is free for you. Please understand that we cannot reimburse any costs that may have incurred by you in connection with the complaint process.

Evaluation of the Effectiveness of the Complaint Procedure

We evaluate the effectiveness of our complaint procedure at least once a year and as needed through self-assessment in the LkSG team and by our independent and competent internal audit.

As part of the annual reporting, the following information is disclosed on our homepage to measure the effectiveness of our complaint and whistle-blower portal:

- Number of complaints according to §§2 II and III LkSG;
- Number of reporting individuals in the categories "Own Employees," "Employees of Direct Suppliers," and "Employees of Indirect Suppliers";
- Proportion of resolved complaints differentiated by "Substantiated Rejection," "Withdrawal of the Complaint," "Remedy," and "No Remedy";
- Average length of time to resolve a complaint.

These indicators are recommended by the Federal Office for Economic Affairs and Export Control (Bundesamt für Wirtschaft und Ausfuhrkontrolle - BAFA) as an appropriate tool for measuring the effectiveness of the complaint procedure according to the LkSG. Further information can be found in the BAFA's „Guidance on the complaints procedure under the German Supply Chain Due Diligence Act."

Best regards,

Michael Schmidt
Managing Director (Geschäftsführer)