



This document contains the procedural regulations of DekaBank Deutsche Girozentrale (Deka-Bank) for dealing with complaints under the LkSG. It enables persons who are directly affected or who may be violated in a protected legal position by economic activities in DekaBank's own business area or by the economic activities of a direct or indirect supplier to DekaBank, as well as persons who are aware of the potential violation of a protected legal position or an environmental obligation to point out risks to or violations of human rights and the environment (hereinafter "**whistleblower** ") and describe the complaints procedure set up for this purpose by Deka-Bank.

1. Setting up a complaints office

DekaBank will take appropriate personnel, organisational and technical measures to ensure that the confidentiality of whistleblowers' identities is maintained in the event of complaints and information received and that effective protection against discrimination or punishment arising from a whistleblower's complaint is ensured. The persons entrusted with the complaints procedure are obliged to maintain confidentiality and to comply with data protection. The ombudsperson is subject to legal confidentiality.

DekaBank has appointed a human rights officer. If the whistleblower does not wish to remain anonymous and in this respect does not respect the confidentiality of their identity, it is possible for the whistleblower to address their complaints to the human rights officer of DekaBank Deutsche Girozentrale. For more information, see <https://www.deka.de/deka-gruppe/kontakt>.

In addition, DekaBank has set up an external ombudsperson as a complaints centre for complaints within the framework of the LkSG in order to protect the confidentiality of the identity of the whistleblower in particular.

The ombudsperson can be contacted during normal business hours by the following means of communication:

Lawyer Dr Rainer Buchert
Kaiserstraße 22, 60311 Frankfurt am Main, Germany
Phone: +49 (0) 049 – 69 710 33330
Fax: +49 (0) 049 – 69 710 34444
Email kanzlei@dr-buchert.de

Dr Caroline Jacob may represent Dr Buchert. She can be reached via the same contact details.

2. Process of the complaints procedure via the ombudsperson

- a. The ombudsperson will acknowledge receipt of the complaint to the whistleblower within seven banking days and document the complaint and its receipt in accordance with legal requirements. For the whistleblower, the ombudsperson is the sole contact person during the entire complaints procedure if the whistleblower wishes to remain anonymous.
- b. Upon receipt of the complaint by the ombudsperson, the ombudsperson will forward the complaint to the human rights officer via the Compliance department of DekaBank with a request for comment within a reasonable period of time, if the ombudsperson has been exempted from the legal obligation of confidentiality by the whistleblower.



- c. When the complaint is transmitted by the ombudsperson to the human rights officer of DekaBank, the human rights officer will take over the clarification of the facts and, as a rule, will submit a statement to the ombudsperson about the complaint within one month.

If the investigation of the facts by the human rights officer of DekaBank shows that the facts of the matter provided by the whistleblower are insufficient or not relevant to the further clarification of the complaint, the human rights officer of DekaBank will inform the ombudsperson accordingly. In this case, the human rights officer will request further information from the whistleblower through the ombudsperson. The processing period may be extended by one month after the human rights officer has informed the ombudsperson accordingly, in particular if this is necessary for further clarification of the facts. The whistleblower will be informed of this by the ombudsperson before the initial deadline for comment expires. An explanation for the reason why DekaBank considers the whistleblower's complaint to be unfounded will not be given if it is prevented from doing so for legal, official or factual reasons.

- d. In consultation with the human rights officer and the executive board, the functional unit will take further appropriate and reasonable measures to avoid a violation of protected legal positions or take corrective action to minimise or remedy violations of protected legal positions that have already occurred. If necessary, the human rights officer may provide further units such as involving Compliance as an expert.

The prerequisite for this is that, as a result of the examination of the complaint, the violation of a human rights or environmental obligation appears possible, imminent or has occurred. Or, as part of the internal audit, knowledge has been gained with regard to a possible violation of a risk to human rights or the environment.

If the investigation of the complaint reveals that there are actual indications (substantiated knowledge) that make a violation of a human rights or environmental obligation possible, DekaBank will be responsible for the relevant event and will immediately take appropriate action in accordance with the LkSG.

3. Review of effectiveness and adaptation

The effectiveness of the complaints procedure is reviewed at least once a year and on an event-by-event basis. The measures will be updated as necessary within a reasonable period of time.

4. Cost and Language

The procedure is free of charge for the whistleblower. Complaints received by the whistleblower in a foreign language as well as correspondence with the whistleblower will be translated free of charge.