

# Rules of Procedure

for complaints under the Act on Corporate Due Diligence Obligations in Supply Chains / Lieferkettensorgfaltspflichtengesetz (§ 8 LkSG)

## § 1 Purpose and Objects of the Rules of Procedure

Pursuant to Section 8 of the LkSG, the Board of Directors of the Rhenus Group has issued procedural rules for its German affiliated companies, operating facilities and branch offices, which contain information on the procedure required by Section 8 of the LkSG to be carried out if a person submits a complaint to the Rhenus Group within the terms of § 2 of these Rules of Procedure..

## § 2 Subject matter of the appeal

A complaint is made when human rights or environmental risks or violations are pointed out that have arisen as a result of the economic activities of the decentralised business units of the Rhenus Group, its associated companies or one of its direct suppliers (§ 8 Paragraph 1 LkSG).

## § 3 Form and language of the complaint

**3.1.** The Compliance Organisation of the Rhenus Group accepts complaints that are submitted in writing, text form or verbally. Complaints are to be addressed to the Compliance Officer as appointed Commissioner for Complaints or submitted via the complaints portal (§ 3.2).

**3.2.** Complaints should be submitted via the complaints portal/Whistleblower System (Complaints Office): Integrity Line (<https://rhenus.integrityline.org>) on the Rhenus Group website ([www.rhenus.group/de/de](http://www.rhenus.group/de/de)). The complaint does not become inadmissible if it is submitted via another channel.

**3.3.** A complaint must be written in German, English, Dutch, Spanish or in the language of a country in which an associated company or branch has its registered office or in which a permanent establishment of the Rhenus Group or its associated companies is located.

## § 4 Right of appeal

Any natural or legal person is entitled to lodge a complaint, regardless of whether their rights are affected by the human rights or environmental risk or violation. If the person is a minor, he or she must be represented by the legal representatives in the complaint and in the proceedings.

## § 5 Dispositions of the appeal

The appellant may at any time extend the appeal, limit it to individual subjects of appeal or withdraw it. In the event of limitation or withdrawal, the procedure will not be continued in this respect. The Rhenus Group is at liberty to clarify the facts and to implement the necessary measures.

## § 6 Commissioner for Complaints

**6.1.** The Commissioner for Complaints within the meaning of Section 8 (3) LkSG are the Compliance Officers of the Rhenus Group. This person is independent of the instructions of the management insofar as he or she fulfils tasks as a Commissioner for Complaints. He or she provides a guarantee for impartial action.

**6.2.** The respective Commissioner for Complaints shall conduct the proceedings in accordance with these Rules of Procedure. Insofar as the Rules of Procedure do not contain any provisions on specific procedures and decisions, the Commissioner for Complaints shall determine the course of the proceedings, the manner in which they are to be conducted or the termination of the proceedings at his or her reasonable discretion.

## **7 Acknowledgement of receipt and communication channel**

**7.1.** As soon as the complaint (§ 2) has been received by the management, the Commissioner for Complaints or the complaints office, the Commissioner for Complaints shall immediately acknowledge receipt of the complaint.

**7.2.** The Commissioner for Complaints may combine this confirmation with the indication that the complaint is admissible. The confirmation may also be combined with the information according to § 8.1. or § 8.2.

**7.3.** The confirmation shall in all cases be accompanied by the information that the Commissioner for Complaints will provide further information at the latest after the expiry of four weeks.

**7.4.** Communication between the Commissioner for Complaints and the complainant is carried out by email via the Complaints Portal, if the complainant does not choose any other way.

**7.5.** The Commissioner for Complaints will only communicate with the complainant if the complainant has opened a communication channel and can be reached. If the complainant communicates via email through the Complaints Portal, the Commissioner for Complaints will reply to the email address known to him or her.

## **§ 8 Examination of the admissibility of the appeal**

**8.1.** After receipt of the complaint, the Commissioner for Complaints shall check whether a notice has been submitted which meets the requirements of § 2. If this is not the case, the Commissioner for Complaints shall give the complainant the opportunity to supplement the notice within a period of not less than two weeks.

**8.2.** If the content of the complaint is sufficient for Rhenus to carry out its own internal clarification, the Commissioner for Complaints will attempt appropriate clarification measures. If the clarification measures lead to the result that the information provided by the complainant meets the requirements of § 2, considering the facts ascertained, the complaint is admissible.

**8.3.** If the measures according to § 8.1 and § 8.2 do not lead to the assumption of an appropriate indication in the sense of the § 2, the notice is considered inadmissible. The complainant will be informed in writing.

**8.4.** The Commissioner for Complaints will inform the complainant finally if the complaint is not admissible. Reasons will be given for the decision.

## **§ 9 Procedure in case of admissible appeal**

**9.1.** In the case of an admissible complaint, the Commissioner for Complaints shall use reasonable legal and factual means to verify whether there is a human rights or environmental risk or violation.

**9.2.** When carrying out the inspection in accordance with § 9.1 due to an indication of risks and violations in the own business area, the Commissioner for Complaints may contact the internal operating sites concerned and request information from employees. He may also seek clarification by means of experts, visual inspection and documents.

**9.3.** When carrying out the review in accordance with § 9.2. due to an indication of risks and violations caused by the actions of a direct supplier, the Commissioner for Complaints can use the available means to clarify the matter through the mediation of the responsible purchasing managers or commercial managers.

**9.4.** If deemed necessary, the Commissioner for Complaints may obtain further information from the complainant.

**9.5.** The Commissioner for Complaints will discuss the facts of the case with the complainant (§ 8 para.1 LkSG).

**9.6.** In the event that the complainant would not be adversely affected by the realisation of the alleged risk, or the rights of the complainant are not affected by the violation, the Commissioner for Complaints shall decide whether and to what extent to inform the complainant of the remedial measures and special preventive measures to be taken or adopted by the company. In doing so, he or she will consult with the management and protect any business and trade secrets.

**9.7.** If the complainant could be injured by the realisation of the risk or has already had his rights affected by the violation, the Commissioner for Complaints will attempt to discuss the remedial and preventive measures under consideration with the complainant in order to jointly define one or more measures. As soon as the Commissioner for Complaints considers this attempt to have failed, he or she will propose to the management the measures to be implemented from his or her point of view and inform the complainant, on the one hand, of the management's decision and, on the other hand, of the implementation of the measure. Provisional measures can also be implemented immediately in case of imminent danger.

**9.8.** Any civil claims of the complainant remain unaffected by this procedure. The complainant may, however, suggest to the Commissioner for Complaints that the latter draw up a proposal providing for a settlement between the company and the complainant whose rights have been infringed. Should such a suggestion be taken up by the Commissioner for Complaints, his proposal will be submitted to the complainant and the management for acceptance and signature.

**9.9.** The Commissioner for Complaints will send a reasoned final report to the complainant in the case of an admissible complaint when he has decided that the proceedings are closed.

#### **§ 10 General principles of procedure**

**10.1.** The confidentiality of the identity of the complainant shall be maintained.

**10.2.** This grievance procedure provides the Commissioner for Complaints with protection against discrimination or punishment by Rhenus SE & Co. KG, its affiliated companies, branches and operating facilities. There shall be no discrimination or punishment on the grounds of a complaint.

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