



**Deutsche
Glasfaser**

RULES OF PROCEDURE

**Complaints procedure according to the
Act on Corporate Due Diligence in Supply Chains
(LkSG)**

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1. Objective and scope of these Rules of Procedure

Behaving responsibly, with integrity and in compliance with the law is a top priority for the Deutsche Glasfaser Group - both in our own business activities and in our relationships with employees, customers, business partners, suppliers and local authorities with whom we work.

Reported information enables us to become aware of possible misconduct or violations by our employees or business partners and to implement appropriate remedial measures on this basis. The reports also help us to identify possible process weaknesses, improve our internal processes and implement preventive measures.

The complaints procedure applies to information and complaints relating to the German Supply Chain Due Diligence Act (LkSG)¹. It covers all information on human rights and environmental risks as well as breaches of duty along the entire supply chain of the Deutsche Glasfaser Group. This includes both our economic activities in our own business area and actions by our direct or indirect suppliers.

Important: We do not process complaints about our products or services via our whistleblower system. Please contact our customer service for this purpose. You can find the contact information on our [homepage](#).

2. Who can provide information?

Any person can report risks or violations of the LkSG's protective positions, regardless of whether he or she works for Deutsche Glasfaser internally (e.g. as an employee or temporary worker) or externally (e.g. as an employee of one of our suppliers). In addition, information can also be reported by persons who have no direct relationship with Deutsche Glasfaser and are not personally affected by the breach of duty or risk.

3. How can complaints be submitted?

Information can be submitted via our whistleblower system, which is available 24/7. Reports can be submitted both electronically via a [web form](#) and by telephone on +49 69 9585 1001 (Mon. to Fri. from 09:00 - 17:00). The whistleblower system is operated by our external partner PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft (PwC), which subjects the information received to an independent preliminary legal review. All reports are forwarded to the Compliance Department of Deutsche Glasfaser for further processing.

¹ In the appendix you will find a detailed overview of the human rights and environmental due diligence obligations pursuant to Section 2 (2) and (3) LkSG. Further information can also be found in the corresponding explanatory memorandum to the law and the BAFA's handout on the complaints procedure. These can be found online at: https://www.bafa.de/SharedDocs/Downloads/DE/Lieferketten/handreichung_beschwerdeverfahren.html

4. What should I bear in mind when providing information?

In order to facilitate the legal review and processing of the information, your information should be as specific and comprehensible as possible. The following key questions can serve as a guide as to which information on the risks or indications of breaches of duty are particularly relevant for us:

- **What happened or what was observed?**
(including a detailed description of the facts and context in chronological order)
- **Who committed the violation? Or who is the initiator of the human rights or environmental risk?**
(including name, position, German fiber optic company or supplier concerned)
- **Who is affected by the breach or has been harmed? In the case of risks: Who could be harmed by the realization of the risk?**
(including the name and number of persons or groups of persons affected and how and to what extent they have been or could be harmed by the infringement)
- **When did the violation occur? Is the violation still ongoing? In the case of risks: Is there a threat of immediate realization of the risk? When is realization to be expected?**
(including date and time or period of the violation)
- **Where did the violation occur or where is the risk?**
(e.g. location, department)
- **Is there any evidence or witnesses to this?**
(including photos, e-mails or other evidence of the violation, details of witnesses and, if applicable, names)
- **Has the violation or risk already been reported elsewhere?**
(e.g. supervisor, representation of interests)
- **What should further contact look like?**
(including whether we may contact you for queries and whether the information should be treated anonymously)

The key questions listed above only serve as a guide when submitting information or complaints. Depending on the case, not all information may always be available. Regardless of how detailed the report is or whether it answers all of the key questions listed above, we always process all incoming reports.

5. How does the complaints procedure work?

All incoming information is processed according to a defined process:



Receipt of the complaint

The information can be sent to us (anonymously if you wish) as described in section 3. After submitting your report, a process number is automatically displayed for a limited period of five minutes. You can use this case number to log in to the whistleblowing system website at a later date, view the current

processing status of the submitted report, add additional information and communicate with PwC via a chat. You will receive written confirmation that the report has been received.

Checking the complaint

The information received is reviewed independently by our partner PwC. This includes a validity check of the report, if necessary, a specification of the report by contacting you and the formulation of an initial recommendation for action. The result of this preliminary review is then forwarded to us.

At Deutsche Glasfaser, only the Compliance department has access to the whistleblower system and thus the information received and pre-checked. The audit steps already carried out by PwC and the recommendations for action are checked for plausibility in order to assess whether the matter requires further clarification or is already sufficiently substantiated. If necessary, further audit steps are carried out, if necessary, with the involvement of other internal departments. Possible internal departments that can be consulted here include HR, Legal, Purchasing, Partner Management or CSR.

Discussion of the facts

We will then discuss the facts of the case with you. If the case is discontinued as a result of the investigation of the tip-off, you will receive a written statement of reasons via the contact channel you have chosen. If the proceedings are not discontinued, the next step is to work out a solution.

Development of a solution

A proposed solution is developed on the basis of the information provided to us. If you as the whistleblower are affected by the reported risk or breach of duty, the proposed solution will be discussed with you. If you are not affected yourself, you will receive information about the proposed solution. When providing information, the relevant data protection regulations will be observed throughout, which may influence the scope of the information that we provide to you as the whistleblower.

Preventive and remedial measures

The preventive and/or remedial measures defined in the proposed solution are implemented. The relevant departments at Deutsche Glasfaser are generally responsible for implementing the remedial measures, with the Compliance department assuming a steering and coordinating role.

Review of the remedy and conclusion of the procedure

We review and evaluate the implementation of the remedial measures internally at regular intervals. As soon as the risk or breach of duty has been sufficiently eliminated, a final report is prepared and the complaints procedure is closed.

Timing

The teams responsible for investigation and remediation under the complaints procedure above will work as efficiently as possible to investigate and resolve complaints in an appropriate manner. However, each investigation and remedial action is different, so the time taken may vary from case to case. Deutsche Glasfaser endeavors to process cases as quickly as possible. In doing so, we follow the principle that the more serious the potential risks or breaches of duty are in terms of intensity and extent, the faster remedial action must be taken. Ideally, the breach of due diligence obligations should be remedied.

6. How is confidentiality and independence ensured?

The complaints procedure is designed to always protect the confidentiality of the whistleblower. The persons involved in the procedure are therefore also obliged to maintain confidentiality. This applies both to employees of Deutsche Glasfaser and to the employees of our external partner PwC. This also applies if the suspicion ultimately proves to be unfounded. It is also possible to submit information anonymously.

The persons entrusted with case processing are not bound by instructions and are always impartial and independent. Corresponding clauses - including a confidentiality clause - have been discussed with the persons concerned and implemented. At the same time, only those persons entrusted with handling the case have access to information in connection with the complaint received (need-to-know principle).

7. Protection of whistleblowers

Deutsche Glasfaser promotes and demands a culture of open communication. Retaliatory measures (discrimination, punishment, measures under labor law, etc.) against persons who report concerns in good faith or provide information about possible misconduct or cooperate in a corresponding investigation will therefore not be tolerated under any circumstances. This also applies if the complaint made in good faith subsequently proves to be unfounded. Within the scope of our possibilities, we will influence our suppliers to ensure that no retaliatory measures are taken if employees of a supplier make complaints.

8. Effectiveness test

Deutsche Glasfaser will carry out an annual and ad hoc review of the effectiveness of the complaint procedure in accordance with Section 8 (5) of the LkSG. The effectiveness test is an essential part of the whistleblower system and is carried out using specific key figures specified by the Federal Office of Economics and Export Control (BAFA).

Appendix

Human rights risks of the LkSG at a glance

Protection of employees Section 2 (2) No. 1 -8	Protection of the basis of civil life Section 2 (2) No. 9 -10	Protection against attacks deploying security forces Section 2 (2) No. 11
<ol style="list-style-type: none">1. prohibition of child labour below the minimum age permitted under the applicable law of the country of employment2. prohibition of the worst forms of child labour3. prohibition of the employment of persons in forced labour4. prohibition of all forms of slavery5. prohibition of disregard for occupational health and safety6. prohibition of disregard for freedom of association7. prohibition of unequal treatment in employment relationships8. prohibition of the withholding of an appropriate wage	<ol style="list-style-type: none">9. prohibition of contamination of the air, water or soil and prohibition of causing excessive water consumption10. prohibition of unlawful forced eviction and unlawful seizure of land, forests and waters	<ol style="list-style-type: none">11. prohibition of the commissioning or use of private or public security forces which, due to a lack of instruction or control, disregard the prohibition of torture or cause injury to life or limb or impair freedom of association.
<p style="text-align: center;">Catch-all rule Section 2 (2) No. 12</p> <ol style="list-style-type: none">12. prohibition of an act or omission in breach of duty that goes beyond numbers 1 to 11, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious when all the circumstances in question are reasonably assessed.		

Environmental risks of the LkSG at a glance

Handling of mercury Section 2 (3) No. 1 -3	Handling of persistent organic pollutants Section 2 (3) No. 4 -5	Handling of hazardous waste Section 2 (3) No. 6 - 8
<ol style="list-style-type: none">1. ban on the manufacture of products containing mercury2. ban on the use of mercury and mercury compounds in manufacturing processes3. ban on the treatment of mercury waste	<ol style="list-style-type: none">4. prohibition of the production and use of certain chemical pollutants5. prohibition of non-environmentally sound handling, collection, storage and disposal of certain wastes	<ol style="list-style-type: none">6. prohibition of export of certain hazardous waste7. prohibition of export of certain hazardous waste from OECD Member States, EC Member States and Liechtenstein to non-listed countries8. ban on the import of certain hazardous waste