



RULES OF PROCEDURE

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

01.01.2026

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1 Objective and scope of these rules of procedure

Responsible, ethical and lawful conduct 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, based on this, to implement appropriate remedial measures. In addition, the information also helps us to identify possible process weaknesses, improve our internal processes and implement preventive measures.

The complaints procedure applies to reports and complaints relating to the Supply Chain Due Diligence Act (LkSG)¹. It covers all reports of 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 department for this purpose. You can find the contact information on our [homepage](#).

2 Who can submit reports?

Anyone can submit reports on risks or violations of the LkSG's protective provisions, regardless of whether they work 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, reports can also be submitted by people who have no direct relationship with Deutsche Glasfaser and are not personally affected by the breach of duty or risk.

3 How can reports be submitted?

Reports can be made via our whistleblower system, which is available around the clock free of charge. Reports can be submitted electronically via our [whistleblower system](#). Reports can also be submitted Monday to Friday from 9 a.m. to 5 p.m. via the telephone channel of this whistleblower system:

- from Germany: +49 800 3800 999
- from abroad: +49 69 99998839

All reports are reviewed and processed by the Compliance Department of Deutsche Glasfaser.

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

4 What should be considered when submitting a report?

To facilitate the legal review and processing of reports, your report should be as specific and comprehensible as possible. The following guiding questions can serve as a guide to the information on risks or indications of breaches of duty that are particularly relevant to us:

- **What happened or what was observed?**
(including as detailed a description as possible 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 names, positions, affected companies or suppliers)
- **Who is affected by the violation or has been harmed? In the case of risks: Who could be harmed if the risk materializes?**
(including name and number of persons or groups of people affected and how and to what extent they have been or could be harmed by the violation)
- **When did the breach occur? Is the breach still ongoing? In the case of risks: Is there an imminent threat of the risk materializing? When is the risk likely to materialize?**
(including date and time or period of the breach)
- **Where did the breach occur or where is the risk imminent?**
(including location, department)
- **Is there any evidence or are there any witnesses?**
(including photos, emails or other evidence of the violation, details of witnesses and names, if applicable)
- **Has the violation or risk already been reported elsewhere?**
(e.g. supervisor, representative body)
- **How would you like us to proceed?**
(e.g. information on whether we may contact you with further questions and whether the report should be treated anonymously)

The key questions listed above are only intended as a guide for submitting reports 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 reports we receive.

5 How does the complaint procedure work?

All reports received are processed according to a defined process:



5.1 Receipt of the report

Reports can be submitted to us (anonymously if desired) as described in section 3.

After submitting your report, you will be asked to assign a 4-digit PIN. You will need this to log into the virtual mailbox for your report later. After assigning the PIN, you will be shown an access code. You will need this code to log into the virtual mailbox in conjunction with the assigned PIN.

You also have the option of providing your email address (even for anonymous reports). This email address will **not** be forwarded to Deutsche Glasfaser. If a message has been received in the virtual mailbox, you will be notified by email and asked to log in to your report. If you do not provide an email address, you will not receive any notification when a message is received. In this case, you must proactively log in to your mailbox to find out the status of your report. After a report has been received, you will receive confirmation of receipt within 7 days at the latest.

5.2 Review of the report

The report received will be reviewed by employees of the Compliance Department. This includes a validity check of the report. Under certain circumstances, you may be required to provide further details of the matter – in this case, you will be contacted via the virtual mailbox.

Only employees of the Compliance Department have access to the whistleblower system and thus to the reports received. If necessary, further investigation steps will be carried out, possibly with the involvement of other internal departments. Possible internal departments that may be involved in this process include Human Resources, Legal, Purchasing, Partner Management or Corporate Responsibility.

5.3 Discussion of the facts

We will then discuss the matter with you. If the case is closed as a result of the investigation, you will receive a written explanation via the virtual whistleblower mailbox. If the proceedings are not closed, the next step is to work out a solution.

5.4 Developing a solution

A proposed solution will be developed based on the information available to us. If you, as the whistleblower, are personally affected by the reported risk or breach of duty, the proposed solution will be discussed with you. If you are not personally affected, you will receive information about the proposed solution that has been developed. The information provided will comply with the relevant data protection regulations, which may affect the scope of the information we provide you as the whistleblower.

5.5 Preventive and remedial measures

The preventive or remedial measures specified in the proposed solution will be 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.

5.6 Review of the remedy and conclusion of the procedure

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

5.7 Time frame

The teams responsible for investigating and remedying issues in accordance with the above complaint procedure work as efficiently as possible to review and resolve the issues in an appropriate manner. However, each investigation and remedial measure is different, so the time required may vary depending on the case. Deutsche Glasfaser strives to process cases as quickly as possible. 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 duty of care will be remedied in its entirety.

6 How are confidentiality and independence maintained?

The complaints procedure is designed to always maintain the confidentiality of the whistleblower. For this reason, the people involved in the procedure at Deutsche Glasfaser are also bound to secrecy. This also applies if the suspicion ultimately proves to be unfounded. In addition, it is also possible to submit information anonymously.

The people entrusted with handling the case are not bound by instructions and are always impartial and independent. At the same time, only those people entrusted with handling the case have access to information relating to the complaint received (need-to-know principle).

7 Protection of whistleblowers

Deutsche Glasfaser promotes and demands an open culture of communication. Retaliatory measures (in particular discrimination, punishment, labour law measures, etc.) against people 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 exert influence on our suppliers to ensure that no retaliatory measures are taken if employees of a supplier raise complaints.

8 Effectiveness review

Deutsche Glasfaser will conduct an annual and ad hoc effectiveness review of the complaint procedure in accordance with Section 8 (5) of the LkSG. The effectiveness review is an essential part of the whistleblower system and is based on specific key figures specified by the Federal Office for Economic Affairs and Export Control (BAFA).

Appendix

Overview of human rights risks of the LkSG

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 employment 2. prohibition of the worst forms of child labour 3. prohibition of the employment of persons in forced labour 4. prohibition of all forms of slavery 5. prohibition of disregard for occupational health and safety 6. prohibition of disregard for freedom of association 7. prohibition of unequal treatment in employment relationships 8. 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 consumption 10. 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> <p>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.</p>		

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 mercury 2. ban on the use of mercury and mercury compounds in manufacturing processes 3. ban on the treatment of mercury waste 	<ol style="list-style-type: none"> 4. prohibition of the production and use of certain chemical pollutants 5. 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 waste 7. prohibition of export of certain hazardous waste from OECD Member States, EC Member States and Liechtenstein to non-listed countries 8. ban on the import of certain hazardous waste