

**S.OLIVER GROUP**

# Rules of Procedure

for the Complaints Mechanism under Supply Chain Due  
Diligence Act (LkSG)  
*of s.Oliver Group*

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## A. Purpose and scope of the Rules of Procedure

Compliance with the Supply Chain Due Diligence Act (LkSG) is a top priority for the s.Oliver Group. The s.Oliver Group complies with the law and is committed to acting with integrity. We take any indication of non-compliance with laws, internal policies and guidelines seriously, investigate them objectively and diligently, and initiate appropriate action where necessary.

For this reason, we give every internal and external person, including suppliers, business partners and third parties, the opportunity to point out grievances within their own sphere of influence or non-compliance with laws by our company.

The s.Oliver Group is aware that complainants may fear adverse effects in the event of complaints. Therefore, this Code of Conduct provides all complainants with extensive protection against adverse consequences. No form of retaliation or adverse action will be tolerated against anyone who, in good faith, has pointed out a possible violation of legal requirements or internal policies. Good faith means sincerely believing that the concern is legitimate and that the content of the complaint is true.

These rules of procedure are also intended to make the internal processes transparent so that all complainants are informed about the procedure in the best possible way.

Violations of these rules of procedure may result in business-related measures, up to and including termination. The effectiveness of the procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments will be made to the procedure.

## B. Regulations

### 1. Who can be the complainant?

Complainants may be all internal and external persons. This includes in particular the following persons: direct and indirect suppliers, business partners and their employees, customers and other third parties.

### 2. What complaints can be reported?

Through the complaints procedure, human rights, environmental or ethical risks or violations according to our [Social Environmental and Ethical Code of Conduct](#) that have arisen as a result of the economic activities of the s.Oliver Group in its own business area or along the entire supply chain (hereinafter summarized as "violations") can be reported.

This specifically includes the following violations:

- a. Child labour
- b. Forced labour
- c. Discrimination, harassment or abuse
- d. Violation of freedom of association and collective bargaining
- e. Violation of fair remuneration
- f. Violation of working hours
- g. Violation of legally binding employment relationship
- h. Violation of health and safety at work
- i. Impairments due to environmental changes
- j. Unlawful eviction
- k. Torture, inhuman or degrading treatment
- l. Violation of other human rights
- m. Violation of environmental rights
- n. Violation of safe chemicals
- o. Violation of climate protection
- p. Violation of waste management standards
- q. Corruption
- r. Violation of fair competition
- s. Violation of business secrets and data protection
- t. Violation of secure accounting
- u. Conflict of interest
- v. Money laundering and terrorist financing
- w. Export Controls and Economic Reprisals

We encourage all complainants to report known or reasonably suspected violations. The complainant should always make a complaint if he or she has a good faith belief that the facts he or she is reporting are true at the time the complaint is made. In good faith means sincerely believing that the concern is legitimate and that the content of the complaint is truthful.

### 3. How can the complaint be submitted (reporting channels)?

The s.Oliver Group offers all potential complainants two different complaint channels. Both complaint channels are of equal value, i.e. all complaints are treated equally, regardless of the system through which they are submitted or received.

The s.Oliver Group allows all complainants to submit complaints without disclosing their identity (so-called anonymous complaints). Anonymous complaints can always be submitted to the Human Rights Officer of the s.Oliver Group and via the digital complaint system.

#### a. Human Rights Officer

Complaints to the s.Oliver Group Human Rights Officer can be made in person, by telephone, by mail or by e-mail (team.sustainability@de.soliver.com).

The contact details of the Human Rights Officer are:

**Sabrina Müller**  
Human Rights Officer  
Head of Global Sustainability  
s.Oliver-Straße 1  
97228 Rottendorf  
Tel.: +49 93 02 / 309 – 6815  
E.Mail: [Sabrina.Mueller@de.soliver.com](mailto:Sabrina.Mueller@de.soliver.com)

#### b. Digital complaint system

The s.Oliver Group's digital complaints system is also available as a further means of contact. This system provides the opportunity to submit complaints about violations confidentially and - if desired - completely anonymously. Only the employees entrusted with the implementation of the complaints procedure (hereinafter referred to as "mandate holders"), who act impartially, independently and without instructions, receive knowledge of complaints submitted via the complaints system. The mandate holders are bound to secrecy.

The digital complaint system can be accessed via the following link:

<https://soliver-group.hintbox.eu/>

### 4. How are complaints handled?

If a complaint is received via the complaint channels, its receipt is documented internally. The mandate holder(s) shall confirm receipt of the complaint to the complainant(s) after seven days at the latest and shall take all further essential steps to process the complaint. The first step is to check the validity of the complaint received or the reported violation. If there are any questions or additional information is required, the complainant will be contacted. The complainant should allow this exchange to take place, as further information may be needed to investigate the complaint.

In the event of a concrete suspicion of a possible violation, internal/external specialists of the s.Oliver Group may be called in and an investigation will be initiated. The investigation may take several months, especially in complex cases. The complainant will be contacted and informed on an ongoing basis.

If neither sufficient fact-based information is available nor contact can be made, the case will be closed due to lack of substantiation.

The complainant will be informed within three months of the acknowledgement of receipt of the complaint about the planned or already implemented follow-up measures and the reasons for them. However, feedback will only be provided if it does not affect internal inquiries or investigations and does not affect the rights of the persons who are the subject of a complaint. Feedback will also be provided in cases where a complaint is not pursued further and the procedure is closed without further action. If, after clarification of the facts, discussion and investigation, the mandate holder(s) responsible for carrying out the complaint procedure is convinced that no violation has occurred, the complainant(s) will be informed in writing. In this case, the proceedings shall be discontinued.

If the investigation confirms the violation, appropriate follow-up measures are initiated by the unit responsible in the company. A proposal may be developed in consultation with the complainant. The complainant is informed about the conclusion of the complaint procedure.

## **5. Complainant protection**

### **a. General**

The s.Oliver Group grants all complainants protection within its own sphere of influence. A central component of the protection of whistleblowers is the confidential treatment of the identity of the complainant. If the complainant provides his/her contact details, these will be processed in compliance with data protection regulations.

The name and other information that directly or indirectly identifies the complainant(s) will not be disclosed. This may not apply if the complainant expressly permits the disclosure of his/her identity, if there is a legal obligation to do so, or if the identity of the complainant is otherwise unavoidably revealed. This also applies in particular if disclosure is indispensable to enable the person affected by the complaint to exercise his or her right to be heard or to defend himself or herself. In such cases, the complainant shall be informed in advance of the disclosure of his or her identity, provided that the information does not jeopardize any relevant investigations or legal proceedings.

### **b. Protection from reprisals**

Retaliation or discrimination (hereinafter, reprisals) against the complainant:in for filing a complaint is prohibited, provided that the complaint was made in good faith. This also applies to threats and attempts of reprisals. Violations will not be tolerated and may in turn be reported in accordance with the provisions of this policy.

The s.Oliver Group does not tolerate reprisals of any kind against complainants:inen based on a specific complaint. This includes, in particular, protection against:

- Suspension, dismissal or comparable measures.
- Transfer of duties, change of work location, reduction in salary, change in working hours
- Negative performance appraisal or issuance of a poor job reference
- Disciplinary action, reprimands or other sanctions, including financial sanctions
- Coercion, intimidation, bullying or exclusion
- Discrimination, disadvantageous or unequal treatment

- Harm (including damage to reputation), particularly on social media, or causing financial loss (including loss of contracts or revenue)
- Early termination or cancellation of a contract for goods or services
- Withdrawal of a license or permit

Complainant protection exists even if the complaint cannot be substantiated. Abuse of complainant protection for other purposes will not be tolerated.

Measures already taken or demonstrably planned before the complaint was filed that are based on a different set of facts are not covered by complainant protection. The same applies to complaints made exclusively with damaging intent. These do not enjoy complainant protection and are sanctioned in clearly provable cases.

## **6. Protection of affected persons**

Each person affected by a complaint shall be notified of the suspicions directed against him or her at the appropriate time, taking into account the requirements of data protection law, unless such notification would significantly impede the progress of the proceedings to establish the facts or the implementation of follow-up measures. The notification shall be made at the latest after the investigation has been completed or when the investigation can no longer be jeopardized.

If a suspicion raised with the complaint is not confirmed, the data subject may request the deletion of his/her data stored by the s.Oliver Group in this context..

## **7. Data protection**

Personal data is collected and stored in the course of proceedings under these Rules of Procedure. Such personal data shall always be handled in compliance with the applicable data protection regulations. Only such personal data will be processed as is necessary for the purposes specified in these Rules of Procedure.

Persons involved in the procedure, including the complainant him/herself, can contact the s.Oliver Group data protection officer at any time ([datenschutz@de.soliver.com](mailto:datenschutz@de.soliver.com)) to have it checked whether the rights existing on the basis of the relevant applicable provisions have been observed.

The respective applicable statutory retention and deletion periods will be observed.

All persons whose personal data is processed by the s.Oliver Group within the framework of a procedure in accordance with these procedural rules may - if the relevant legal requirements are met - demand their right to be notified of incorrect data, to have their data blocked or deleted, or to be informed about the personal data stored about them by the s.Oliver Group. Furthermore, these persons may also assert their right to data portability at any time or complain to a supervisory authority about any processing of their personal data that does not comply with data protection law.

A data subject also has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her on the basis of a legitimate interest.