

## **Rules of Procedure for the complaint procedure in accordance with Section 8 of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG)**

DB Bahnbau Gruppe takes responsibility for respecting and strengthening internationally recognized human rights within the company and through appropriate management of its supply chains. DB Bahnbau Gruppe GmbH implements all of the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (*LkSG*) to fulfill human rights and environment-related due diligence obligations, and they track implementation of these requirements. One of the essential core elements of these due diligence obligations is to establish an effective complaint procedure, which allows information about human rights and environment-related risks and violations to be submitted.

These rules of procedure provide information about the main features of the complaint procedure, how to access the procedure, and responsibilities. They also provide information about how incoming reports are handled, i.e. how the complaint procedure is carried out. It is important to DB Bahnbau Gruppe GmbH to present this information in an understandable way and to create the greatest possible transparency about the process.

### **What is the purpose of the complaint procedure?**

The complaint procedure is intended to give any person or group of people the opportunity to submit relevant reports to Deutsche Bahn AG and its companies, drawing attention to human rights and environment-related risks (***early warning system***).

It also gives people or groups of people the opportunity to provide information about suspected infringements so that harm can be immediately averted or minimized (***access to appropriate remedy***).

### **Who is the complaint procedure intended for? Who can submit reports?**

Anyone can submit reports regardless of whether they do so in Germany or another country.

### **What types of reports can be submitted?**

The complaint procedure makes it possible for people to provide information about human rights or environment-related risks and violations of human rights or environmental obligations that have arisen as a result of the economic activities of Deutsche Bahn AG and its companies in their own business operations or in the supply chain.

### **How can I submit reports?**

Reports can be submitted at any time through two different channels. All reports, regardless of the way in which they are received by Deutsche Bahn AG and its companies like DB Bahnau Gruppe, are processed immediately and in the same way.

- Deutsche Bahn AG provides an electronic whistleblower system in which reports can be submitted using an online form. It is available in 22 languages. The whistleblower system is available at <https://www.bkms-system.net/deutschebahn> by selecting the menu item "Violations of environmental regulations and human rights as well as related risks".
- Reports can be sent by mail to:

Deutsche Bahn AG  
Nachhaltigkeit und Umwelt  
LkSG-Beschwerdeverfahren  
Potsdamer Platz 2  
10785 Berlin, Germany

Both channels ensure that information is handled confidentially. The complaint system makes it possible to set up an inbox that enables communication between the person providing the information and Deutsche Bahn AG and its companies while keeping the person's identity confidential.

### **Who handles the reports?**

Selected and specially trained employees handle the reports at Deutsche Bahn AG and/or the relevant companies.

All employees responsible for processing complaints and information meet the following requirements. They are:

- Impartial
- Independent
- Not bound by functional directives
- Sworn to secrecy
- Trained appropriately
- Given sufficient resources in terms of time

### **How does the complaint procedure work?**

- Once report is received, the person submitting the report receives confirmation of receipt within one week.
- Deutsche Bahn AG or the relevant companies will stay in contact with the person providing the information during the entire procedure if the person would like to be in contact and if the ability to contact the person exists.
- The reports are first reviewed centrally to determine whether the reported information refers to a human rights or environment-related risk or a violation of human rights or environmental obligations. This review also determines which company or supplier is concerned. The reports are then passed on to the relevant organization, for example within a company.
- This review is carried out by the "Sustainability & Environment" organizational unit of Deutsche Bahn AG.
- The next step involves clarifying the facts, which is generally done within three months. The clarification of the matter is entrusted to the individuals responsible for the complaint procedure at Deutsche Bahn AG and its subsidiaries, respectively. As described above, they act impartially and are obligated to maintain confidentiality.
- If, in the course of clarifying the facts, it is determined that a violation of human rights and/or environment-related obligations is imminent or is already taking place, remedial measures are initiated without delay.
- In addition, a proposal for further action is prepared based on the clarification of the facts.

### **How are individuals providing information protected against discrimination and reprisals due to their disclosures?**

Protecting people who submit reports from being discriminated against or penalized as a result of complaints or information they submit is an important part of our complaint process.

The following measures have been put in place to protect people who provide information:

- All reports are handled only by a small group of selected and specially trained employees.
- All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, is treated confidentially. This also applies even after the complaint procedure has concluded.
- In accordance with legal requirements, internal company documentation is retained for seven years and then destroyed.

Deutsche Bahn AG and its subsidiaries protect individuals providing information from discrimination or retaliation based on their disclosures.