



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)

Deutsche Bahn takes responsibility for respecting and strengthening internationally recognized human rights at its own business units and through appropriate management of its supply chains. Deutsche Bahn AG and its companies implement 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 information and complaints are handled, i.e. how the complaint procedure is carried out. It is important to Deutsche Bahn AG and its companies 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 complaints or information 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 complaints or information?

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





What types of information or complaints 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 complaints or information?

Complaints and information can be submitted at any time through two different channels. All complaints and information, regardless of the way in which they are received by Deutsche Bahn AG and its companies, are processed immediately and in the same way.

- Deutsche Bahn AG provides an electronic complaint system in which complaints and information can be submitted using an online form. It is available in 22 languages. The complaint system is available at <https://www.bkms-system.net/deutschebahn>.
- Complaints and information can be sent by mail to:

Deutsche Bahn AG
Nachhaltigkeit und Umwelt
LkSG-Beschwerdeverfahren
Potsdamer Straße 8
10785 Berlin

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 complaints and information?

Selected and specially trained employees handle complaints and information 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 instructions
- Sworn to secrecy
- Trained appropriately
- Given sufficient resources in terms of time



How does the complaint procedure work?

- Once a complaint or information is received, the person submitting the complaint or information receives confirmation of receipt within approximately 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.
- Generally, the complaints or information 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 complaint or information is then passed on to the relevant organization, for example within a company.
- The next step involves clarifying the facts, which is generally done within three months. 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.
- The employees involved in the complaint procedure follow up on whether and to what extent the remedial measures are implemented.
- In addition, a proposal for further action is prepared based on the clarification of the facts.

How are people protected from discrimination and reprisals due to a complaint or information?

Protecting people who submit complaints or information 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 complaints and information 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 companies protect people who submit complaints or information from being discriminated against or penalized as a result of a complaint.