

Rules of Procedure for the Complaints Procedure within the Meaning of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

DFKI assumes responsibility for respecting and strengthening internationally recognised human rights within its own business area and through appropriate management of its supply chains. DFKI implements all requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) for the fulfilment of human rights and environmental due diligence obligations. An essential core element of these due diligence obligations is the establishment of an effective complaints procedure through which information on human rights and environmental risks or violations can be submitted. These rules of procedure provide information on the main features of the complaints procedure within the meaning of the Act on Corporate Due Diligence Obligations in Supply Chains, access to the procedure and its availability, and responsibilities. Furthermore, it also provides information on what happens with incoming information and complaints, i.e. how the complaints procedure is carried out. It is important to DFKI to present this information in an understandable and traceable manner and to create the greatest possible transparency about the process. At DFKI, the complaints procedure is handled by the internal whistleblower system.

1. Who can submit complaints or reports?

The complaints procedure allows information and complaints from all DFKI employees, business partners and other external third parties.

2. What kind of complaints or reports can be submitted?

The complaints procedure enables complaints and reports of human rights and environmental risks as well as violations of human rights or environmental due diligence obligations arising from DFKI's own business activities or those of a supplier.

3. Who is responsible for processing complaints or reports?

Complaints or reports are processed by selected and specially trained DFKI employees.

All employees who are responsible for processing the case are impartial, independent, not bound by instructions and obliged to maintain confidentiality. In addition, they are appropriately trained and have sufficient time resources to understand and assess the situation and the procedure from the perspective of the whistleblower and to deal with it in the further procedure.

4. Which reporting channels can be used to submit complaints or information?

Complaints or information can be submitted via the following reporting channels:

- **Anonymous reporting platform:** www.sicher-melden.de/dfki

The reporting platform is available in German and English, is free of charge and can be accessed around the clock. It works on all end devices (e.g. computer, smartphone, tablet, etc.) and is barrier-free, i.e. can also be used by people with hearing and/or visual impairments.

The reporting platform can be used anonymously and does not allow any conclusions to be drawn about the identity of the person making the report. It is located on an external platform and is therefore not part of DFKI's IT infrastructure. The operator of the platform has no access to the information received. It is technically and organisationally ensured that access to the system and the underlying communication is protected.

The person giving the report receives a report ID when the information is provided. This must be noted down and retained. The whistleblower can use the whistleblowing ID to track the processing status and communicate via an anonymous mailbox with the employees responsible for processing the whistleblowing and complaints.

- **By post / internal mail:** Confidential - do not open, German Research Centre for Artificial Intelligence GmbH (DFKI), Compliance Department, Trippstadter Straße 122, 67663 Kaiserslautern, Germany
- **e-mail:** compliance@dfki.de
- **By telephone:** The whistleblower hotline is available on weekdays from 9 a.m. to 6 p.m. on +49/631-20575-5666.
- **Personally to Compliance:** The Compliance department also accepts reports in person. An appointment should be arranged in advance via compliance@dfki.de.

5. What is the procedure after submitting a complaint or report?

Any information will be treated confidentially and in compliance with the applicable data protection laws.

- **Confirmation of receipt:** The whistleblower will receive confirmation of receipt of the report within 7 days. Together with the confirmation of receipt, they will be informed about the next steps, the time frame of the procedure and the principles for their protection.
- **Checking the report (plausibility check):** Once the report has been received, it is checked whether there are sufficient factual indications of an actual or potential violation of the rules (plausibility check). If there are such indications, an internal investigation is carried out. If there are no indications of a violation of the rules, the case is closed. The person providing the information is informed of the result of the check and receives a statement of the reasons for the decision.
- **Clarification of the facts:** The facts of the case are investigated impartially as part of the internal investigations. If necessary, the facts of the case are discussed with the person providing the information. If necessary, other internal departments are involved in the process.
- **Remedial measures:** In the event of a violation of the rules, appropriate follow-up measures (preventive and remedial measures) are initiated - if necessary also in coordination with the person making the report - so that any irregularities detected can be remedied as quickly as possible.
- **Conclusion of the procedure:** The procedure is deemed to have been completed if all specified remedial measures have been implemented. The whistleblower will be informed of the conclusion and outcome of the procedure.
- **Duration of proceedings:** The duration of the procedure depends on the scope and complexity of the report. In any case, reports and the resulting investigations are processed immediately.
- **Information for the person making the report:** Transparent and continuous communication with the person making the report about the progress of the procedure and the progress made takes place from the time the report is received until the procedure is concluded. The person making the report will receive feedback on the result of the investigation, measures already taken or planned and the reasons for these no later than three months after receipt of the report. Feedback will only be provided to the extent that it does not jeopardise internal enquiries or investigations and does not prejudice the rights of the persons who are the subject of a report or who are named in the report. If the investigation has not been completed after three months, the person making the report will be informed of the interim status of the investigation.

- **Review of the effectiveness of the complaints procedure:** The effectiveness of the procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments are made to the procedure or corrective measures are taken.

6. How are complainants or persons providing information protected?

The protection of persons providing information is of great importance to DFKI.

- **Maintaining the confidentiality of identity:** Information provided and the identity of the person providing information and persons involved in the investigation will be treated in strict confidence. The identity of a person providing information will only be disclosed if this person expressly authorises the disclosure or if there is a corresponding legal obligation. The person providing information shall be informed in advance of the disclosure of his/her identity unless this information would jeopardise the corresponding investigations or legal proceedings.
- **Protection from reprisals:** Persons who report (potential) rule violations to the best of their knowledge and belief do not have to fear any discrimination, punishment, or other retaliatory measures (reprisals) because of the report. Retaliation or the threat or attempt of retaliation will not be tolerated and will also be considered an offence. Employees who sanction or discriminate against whistleblowers or persons who help to clarify a suspicion on the basis of the reporting or cooperation must expect consequences under labour law.
- **Data protection:** Data protection requirements are comprehensively fulfilled in accordance with the GDPR as part of the complaints procedure.