Stadtsparkasse München | Die Bank unserer Stadt.

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

This document is the procedural rules of Stadtsparkasse München for handling complaints according to the LkSG[1]. The procedural rules describe the complaint procedure established by Stadtsparkasse München for this purpose.

1. **pointing out person**
   The Complaints Procedure allows potentially affected persons to indicate human rights and environmental risks or violations (hereinafter "whistleblower"). Potentially affected persons are persons who:
   - through economic activities in their own business area of Stadtsparkasse München or
   - are directly affected by economic activities of a direct or indirect supplier of Stadtsparkasse München or
   - may be injured in a protected legal position
   - as well as persons who have knowledge of the possible violation of a protected legal position or an environmental obligation.

2. **reporting channel for a "notification to the LkSG" on the website of the Stadtsparkasse München**
   The Stadtsparkasse München has set up a "Button" "Notification to the LkSG" on its website for a corresponding notification (www.sskm.de/supply-chain).

   If the person giving the hint clicks on the button, he/she can provide the relevant information about his/her complaint in text form. This text will automatically be sent by e-mail to the "complaints officer".

3. **complaints officer**
   The "complaints officer" is the exclusive contact person for the person providing the information during the entire complaints procedure.
   The "complaints officer" guarantees impartiality and acts independently and without instructions within the scope of his/her function.

4. **procedure of the complaint procedure**
   a. **acknowledgement of the tip-off**
   The informing person will receive an e-mail confirmation of the receipt of the information within 5 working days. If the complaint is made anonymously in a way that makes it impossible to contact the informing person or by (un)deliberately providing false contact

[1] The LkSG is available online at: https://www.gesetze-im-internet.de/lksg/

Stadtsparkasse München | Anstalt des öffentlichen Rechts
Postanschrift: Stadtsparkasse München | 80791 München
Zentrale: Sparkassenstraße 2 | 80331 München
Verwaltungszentrum: Ungererstraße 75 | 80805 München
Telefon 089 2167-0
Telefax 089 2167-900 000
www.sskm.de
Amtsgericht München
HRA 75459
BLZ 701 500 00
BIC: SSKM DE MM

information, Stadtsparkasse München is not required to identify the informing person in order to comply with its obligations regarding communication.

b. clarification of facts and statement

The complaints officer will determine if the reported information falls within the scope of the complaint procedure according to LkSG.

(1) rejection of the complaint

If the complaint does not fall within the scope of the grievance procedure, the person making the referral will be notified within two weeks of receipt of the complaint.
As a rule, a statement of the reasons for the rejection is sent to the person making the referral. An explanation of the reason for which the Stadtsparkasse München considers the complaint of the person providing the information to be unfounded is not provided if this is precluded for legal, regulatory or factual reasons of the complaints office.

(2) follow-up of the complaint

If the complaint falls within the scope of the complaints procedure, the complaints officer shall clarify the facts of the case and, as a rule, issue a statement to the person providing the information within one month.

If the investigation of the facts reveals that the information provided by the person making the allegation is not sufficient or not relevant for further clarification of the complaint, the complaints officer shall inform the person making the allegation of this and request further information.
If necessary, the complaint officer will discuss the facts with the person making the referral with the goal of gaining a better understanding of the facts.

c. Possible violation of law

If the investigation of the complaint reveals that the violation of a LkSG-related duty appears possible, imminent or has occurred in Stadtsparkasse München's own business area or at a direct or indirect supplier, Stadtsparkasse München will initiate appropriate preventive and/or remedial measures. The aim of these measures is to avoid a violation of protected legal positions or to minimize or remedy violations of protected legal positions that have already occurred.

d. Review of effectiveness and adjustment

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis.

5. Documentation

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The respective complaint process is documented and retained in accordance with legal requirements.

5. data protection and confidentiality

Stadtsparkasse München ensures through appropriate personnel, organizational and technical measures that the confidentiality of the identity of whistleblowers is maintained for incoming complaints and tips and that effective protection against disadvantage or punishment due to a complaint is guaranteed. The persons entrusted with the complaints procedure are obliged to maintain confidentiality and to comply with data protection.

6. costs

The procedure is free of charge for the pointing out person.

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