

Freiburger Verkehrs AG

Rules of Procedure for the Complaints Procedure in Accordance with Section 8 of the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (LkSG)

I. Introduction

The Freiburger Verkehrs AG is committed to respecting human rights and protecting the environment. It is the declared goal of the enterprise's management to respect, protect and promote human rights and the environment along the entire supply chain. Violations of internationally recognized human rights and of national and international environmental protection regulations will not be tolerated. The Freiburger Verkehrs AG takes appropriate and effective measures to identify and verify human rights- and environment-related risks in its own business area and throughout the supply chain, and to prevent violations. Human rights- and environment-related due diligence obligations include the establishment of an effective complaints procedure through which persons can report violations, risks and other issues.

These Rules of Procedure explain the process for reporting and handling information. It sets out how the complaints procedure may be accessed, who is responsible, what happens after receipt of a complaint, and what measures are taken to protect whistle-blowers. The aim of the complaints procedure is to establish an easily accessible and secure way of communication that allows for the swift identification, mitigations and elimination of human rights- and environment-related risks and violations in the supply chain.

II. Addressees and scope of application of the complaints procedure

The complaints procedure is publicly accessible and available to all persons, whether based in Germany or abroad. The complaints procedure enables persons to report human rights- and environment-related risks as well as violations of human rights- or environment-related obligations that are a result of the economic actions of the Freiburger Verkehrs AG or take place in the supply chain.

III. Procedure

Regardless of the reporting channel through which a complaint is submitted, the procedure shall be uniform after the receipt of the complaint.

1. Responsibility for the complaints procedure

The responsibility for receiving and processing complaints lies exclusively with employees who act impartially, are bound to secrecy and are not subject to any instructions within the framework of the complaints procedure.

2. Submission of a complaint

In principle, whistle-blowers have several reporting channels at their disposal:

- An internet-based reporting portal, which can be accessed in several languages via the following link:

<https://preprod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/supplier-os-hub/public-access-app/complaint.html#/public/hub/freiberger-verkehrs/DEFAULT/complaint/new>

- Postal complaints can be sent to the following address:

*Freiburger Verkehrs AG
Meldestelle nach LkSG
Besanconallee 99
79111 Freiburg*

Complaints can be submitted confidentially or anonymously. The processing status of a complaint submitted via the internet-based portal can be tracked within the portal.

3. Receipt of a complaint

After receipt of a report, the person submitting the report receives a confirmation of receipt. The confirmation of receipt is usually sent immediately; if necessary, the dispatch of the confirmation of receipt can be delayed by up to two weeks.

4. Processing of the complaint

After receipt of the complaint, it is reviewed centrally and assigned to a responsible case-handler. The responsible case-handler maintains contact with the person providing the information. The responsible case-handler assesses the facts of the case and, if necessary, reviews the facts with the whistle-blower. If a violation of human rights- or environment-related obligations is identified, the responsible case-handler initiates corrective measures immediately. If the complaint includes a human rights- or environment-related risk, without a violation having occurred, the responsible case-handler initiates preventive measures. Any complaint provided will also be taken into account within the risk analysis for the supply chain. The results of the fact-finding process are communicated to the whistle-blower, and, if necessary, further steps are reviewed together with the whistle-blower.

As a general rule, complaints shall be processed and concluded within three months after receipt.

5. Anonymous submission of a complaint

Complaints may be submitted anonymously. If a complaint is submitted anonymously, no data will be recorded that would enable the identification of the person submitting the complaint. If the person submitting the anonymous complaint provides information that would allow conclusions on his or her identity, the information will be treated confidentially.

6. Whistleblower Protection

The confidentiality of personal data and other information that allows the identification of the whistleblower will be guaranteed. Only the responsible caseworker and the person responsible for assigning the reports will be able to view a report.

All responsible caseworkers are specially selected and trained. The Freiburger Verkehrs AG ensures through appropriate measures that the whistleblower is protected from disadvantage or punishment for the submitted report.

7. Documentation of complaints

Pursuant to Section 10(1) sentence 2 LkSG, complaints will be kept for seven years.

