

**RULES OF PROCEDURE FOR THE
COMPLAINTS PROCEDURE
PURSUANT TO SECTION 8 SCDDA
AT VOLKSBANK KRAICHGAU EG**

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Change history

Version	Release date	Changes
1.0	01/01/2024	Initial publication
2.0	01/06/2024	Supplemented by subsidiaries

1 Introduction

The Supply Chain Due Diligence Act (SCDDA, in German: Lieferkettensorgfaltspflichtengesetz, LkSG) requires companies covered by it to set up a complaints procedure. These rules of procedure describe the complaints procedure set up at Volksbank Kraichgau eG in accordance with Section 8 SCDDA and regulate in particular the group of persons who may raise concerns, the responsibility for concerns raised, the reporting channels, the course and the costs of the procedure. As the parent company, Volksbank Kraichgau eG also handles the complaints procedure for all of its subsidiaries.

2 What is the aim of the complaints procedure?

Potentially affected parties can use the procedure to raise concerns regarding violations of the contents and objectives of the SCDDA. This refers to all human rights and environment-related risks or breaches of duty that are covered by Section 2 (2) and (3) SCDDA.

Volksbank Kraichgau must investigate any complaints received and counteract potential risks or violations of the requirements of the SCDDA. The complaints procedure therefore fulfills part of the duty of care required by law of Volksbank Kraichgau.

3 Who belongs to the potentially affected group of people?

Persons can be potentially affected due to

- activities in their own business area of Volksbank Kraichgau,
- activities of direct or indirect suppliers of Volksbank Kraichgau,
- infringement of their protected legal position or
- knowledge of a possible violation of a protected legal position or a human rights or environment-related obligation, and raise a concern.

4 Who is the contact person within the complaints procedure?

As part of the complaints procedure, the Supply Chain Compliance Officer is the sole point of contact for persons raising a concern throughout the entire complaints procedure. In their function, the Officer is independent and not bound by instructions and thus offers the guarantee of impartial action.

5 How can a concern relevant to the SCDDA be raised?

The website of Volksbank Kraichgau lists various contact options for persons to raise their concern. These are:

- Contact form: www.vbkraichgau.de/service/Beschwerdeformular-Lieferketten-sorgfaltspflichtengesetz
- E-mail: LkSG-Beschwerde@vbkraichgau.de
- Phone: 06222 / 589-0
- Letter: Volksbank Kraichgau eG
LkSG-Beschwerdemanagement
Hauptstraße 139, 69168 Wiesloch

6 What process does the complaints procedure follow?

The complaints procedure sets in upon receipt of the complaint and concludes with a) rejection or b) full clarification of the matter.

Receipt	The Complaints Management unit forwards the concern received to the Supply Chain Compliance Officer if a potential SCDDA violation is identified.
Confirmation of receipt	Receipt of the concern will be confirmed to the person who raised it within five bank working days via the selected contact channel (phone, letter, e-mail) by the Supply Chain Compliance Officer. If a contact option is not specified (anonymous tip-off), Volksbank Kraichgau is not obliged to determine it. In such cases there is no need to send a confirmation of receipt.
a) Rejection	If the concern does not fall within the scope of the SCDDA, the person who raised it will receive a response within ten bank working days of receipt of the concern. Reasons for the rejection must be provided. Exceptions to this are, for example, legal or official reasons.
b) Clarification of the matter	If the concern falls within the scope of the SCDDA, the Supply Chain Compliance Officer will begin to clarify the facts of the matter. For this purpose, further information can be requested from the person who raised the concern or the need for a discussion of the matter can be suggested in order to better understand the matter in detail.

If it transpires that a breach of the SCDDA-related obligations

- seems possible,
- is imminent or
- has occurred

in the business area of Volksbank Kraichgau group itself or in the business area of a direct or indirect supplier of Volksbank Kraichgau, the existing specific risk analysis must be updated immediately or a specific risk analysis must be prepared.

Adequate preventive and/or remedial measures must be initiated as a result of the specific risk analysis. The measures must be suitable for preventing the violation of protected legal positions or for minimizing or eliminating violations that have already occurred.

The clarification of the matter must be completed within three months and is concluded with a statement to the person(s) who raised the concern.

7 How often is the effectiveness of the complaints procedure reviewed?

The effectiveness of the complaints management system is reviewed by the Supply Chain Compliance Officer on an ad hoc basis and at least once a year.

8 How are documentation and retention handled?

Every SCDDA complaint received is documented and retained in accordance with Section 10 SCDDA. Complaints that do not fall within the scope of the SCDDA may have different timelines for documentation and retention.

9 How are the confidentiality and protection of the data ensured?

When a concern is received, Volksbank Kraichgau ensures that the confidentiality of the information and the identity of the person(s) raising the concern are protected by using suitable personnel, organizational and technical structures. It must be ensured that persons who raise concerns are protected from disadvantages and punishment. The employees entrusted with the complaints procedure are therefore obliged to maintain confidentiality and comply with data protection regulations.

Confidentiality and data protection relate to

- the person(s) raising a concern,
- the person(s) and contents that are the subject of the concern, and
- any other persons named or contents of the concern.

10 What are the costs of using the procedure?

Persons raising a concern do not incur any costs; the procedure is free of charge for them.

11 What are the options for amicable dispute resolution?

Volksbank Kraichgau participates in the dispute resolution procedure of the German cooperative banking group. To settle disputes with Volksbank Kraichgau, it is possible to involve the ombudsperson for the cooperative banking group: www.bvr.de/Service/Kundenbeschwerdestelle

Further details are set out in the “Rules of Procedure for the Out-of-Court Arbitration of Customer Complaints in the German Cooperative Banking Group”, which will be made available upon request. The complaint must be sent in text form (e.g. by letter, fax or email) to the customer complaints office at the National Association of German Cooperative Banks (BVR)

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