



# RULES OF PROCEDURE FOR COMPLAINT PROCEDURE

**Pursuant to section 8 of the Act on Corporate Due  
Diligence Obligations for the Prevention of Human Rights  
Violations in Supply Chains  
(Lieferkettensorgfaltspflichtengesetz- Supply Chain Act)**

# CONTENT

<b>1</b>	<b>Preamble</b>	<b>1</b>
<b>2</b>	<b>Object and purpose</b>	<b>1</b>
<b>3</b>	<b>Scope</b>	<b>2</b>
<b>4</b>	<b>PROCEDURES AND RESPONSIBILITIES</b>	<b>2</b>
	4.1 Procedural principles	2
	4.2 Admissibility	3
	4.3 Complaint channels	3
	4.4 Procedure	3
	4.4.1 Trial beginning	3
	4.4.2 Pre-process	4
	4.4.3 Main method	4
	4.4.4 Procedure closure	4
	4.5 Protection of whistleblowers	5
	4.6 Responsibilities	5
	4.7 Data protection	6
<b>5</b>	<b>Effectiveness of the appeal procedure</b>	<b>6</b>
<b>6</b>	<b>Release, entry into force and update</b>	<b>6</b>
	<b>Attachment of complaint channels</b>	<b>7</b>
	<b>Imprint</b>	<b>8</b>

# 1 PREAMBLE

Respect for human rights is important for Deutsche Lufthansa Aktiengesellschaft, Lufthansa Technik AG, Lufthansa Cargo AG and its affiliates, on which they exert a decisive influence (together "**Lufthansa Group**"). As a globally operating aviation company, we are convinced that our goal of connecting people, cultures and economies in a sustainable way can only be achieved in the long term if the realities of life of people worldwide allow to decide freely and responsibly to take our offer. As a member of the UN Global Compact, it is therefore important for Deutsche Lufthansa Aktiengesellschaft to reconcile entrepreneurial actions with internationally recognized principles and voluntary commitments and not only to enshrine respect for human rights as an integral part of its own corporate culture, but also to address and demand it appropriately in its supply chain.

In order to enable persons to advert Lufthansa Group to human rights and environmental related risks as well as to violations of human rights or environmental obligations within the meaning of section 2 Supply Chain Act, which may have arisen as a result of the economic activity of one of the companies of Lufthansa Group or of a supplier, the Lufthansa Group has set up a central complaint procedure. With these Rules of Procedure, Lufthansa Group establishes clear guidelines that ensure that any hint is handled carefully and transparently and in accordance with the requirements of section 8 LkSG by Lufthansa Group.

## 2 OBJECT AND PURPOSE

The aim of the complaint procedure is to obtain information about human rights or environmental related risks within the meaning of section 2 Supply Chain Act within Lufthansa Group and at its suppliers as early as possible in order to enable Lufthansa Group to take measures that prevent the occurrence of human rights and environmental rights violations. Should a violation of human rights or environmental related obligations within the meaning of section 2 Supply Chain Act, which is attributable to the economic actions of Lufthansa Group, including in its supply chains, have already occurred, the complaint procedure serves to grant the persons concerned access to appropriate remedial action to the extent possible for Lufthansa Group. In addition, hints support and supplement Lufthansa Group's regular analyzes of human rights and environmental related risks in its supply chains, as well as to take preventive measures that prevent the occurrence of violations resulting from such risks.

In order to attain the objectives of the complaint procedure, these Rules of Procedure lay down:

- the scope of these Rules of Procedure for complaints;
- the principles and procedures under which complaints are dealt with in the Lufthansa Group;

- Responsibilities within the Lufthansa Group for the application of the complaint procedure and
- the rights of the parties.

## 3 SCOPE

These Rules of Procedure shall apply to any hint, also anonymously transmitted hints, by one or more persons ("**Whistleblowers**") to human rights or environmental-related risks as well as to violations of human rights-related or environmental-related obligations within the meaning of section 2 Supply Chain Act, which have arisen as a result of the economic activities of any group company of the Lufthansa Group or one of its direct or indirect suppliers in their supply chains within the meaning of section 8 Supply Chain Act ("**Complaint**").

## 4 PROCEDURES AND RESPONSIBILITIES

### 4.1 Procedural principles

The Lufthansa Group carefully examines the facts on which a Complaint is based in the course of the complaint procedure, in compliance with the legal and internal requirements and regulations as well as the rights of the involved parties.

The complaint procedure shall be carried out quickly and without interruption.

The complaint procedure is transparent. The Lufthansa Group will discuss the respective Complaint and the facts underlying it with the respective Whistleblowers, provided that they either provide information on their accessibility in the context of the Complaint or, in the case of a Complaint made anonymously via the electronic whistleblower system, set up a mailbox, via which communication with the anonymous Whistleblowers is possible. The Whistleblowers will regularly be informed about the progress of the procedure. The conclusion of any procedure shall be notified to the Whistleblower, as well as any measures adopted to minimize any identified human rights or environmental risk or to terminate or minimize the consequences of any identified violation of human or environmental rights-related obligations arising from the economic activities of any Lufthansa Group company or any of its direct or indirect suppliers.

The complaint procedure shall be documented. Each incoming Complaint is recorded and the individual procedural steps and, where appropriate, subsequent measures are documented in a comprehensible manner.

Effective protection of Whistleblowers from discrimination or punishment on the basis of a Complaint is ensured. Complaints can be made anonymously. Anonymity has no influence on the conduct of the complaint procedure.

## **4.2 Admissibility**

Any person may lodge a Complaint with the Lufthansa Group. Complaints may be made to the Lufthansa Group in writing or orally, also anonymously.

Hints based on false allegations of fact or solely aimed at discrediting persons or undertakings or otherwise constituting an improper use of the complaint procedure shall not be considered as Complaints within the meaning of these Rules of Procedure.

## **4.3 Complaint channels**

Complaints may be made through one of the following complaint channels:

- in writing via the Lufthansa Group electronic whistleblower system,
- in writing, by telephone or in person via the ombudsperson of the Lufthansa Group,
- in writing by e-mail and
- in writing by letter to the business address of Deutsche Lufthansa Aktiengesellschaft.

Information on the accessibility of the complaint channels (telephone numbers, web links, e-mail address, business addresses, ombudsperson) is contained in the Appendix on Complaint Channels to these Rules of Procedure.

Employees of the Lufthansa Group may also lodge Complaints through any channels agreed for this purpose between the employee representatives and the respective company of the Lufthansa Group.

## **4.4 Procedure**

The complaint procedure shall consist of a preliminary procedure, a main procedure, the closure of the procedure and, where appropriate, the performance audit of measures decided.

### **4.4.1 BEGINNING OF A PROCEDURE**

The complaint procedure begins with the receipt of a Complaint by the Lufthansa Group via one of the complaint channels.

Where possible, the Complaint shall include the facts on which it is based. If available, documents and other evidence may be submitted by the Whistleblower to the Lufthansa Group as part of the Complaint.

The Lufthansa Group shall acknowledge receipt of any Complaint to the Whistleblower within ten days. An acknowledgement of receipt shall only be given if, within the context of their respective Complaint, Whistleblowers have either provided information on their accessibility or, in the case

of an anonymous Complaint lodged via the electronic whistleblower system, have set up a mailbox through which communication with the anonymous Whistleblowers is possible.

## 4.4.2 PRELIMINARY PROCEDURE

Upon receipt of a Complaint, the Lufthansa Group checks this for plausibility.

The Lufthansa Group shall discuss the Complaint and the facts underlying it with the Whistleblowers as soon as possible taking into account the urgency of the Complaint, at the latest within two month of receipt. The prerequisite for this is that the Whistleblowers have either provided information on their accessibility within the scope of their respective Complaint or, in the case of an anonymous Complaint filed via the electronic whistleblowing system, have set up a mailbox, via which communication with the anonymous Whistleblowers is possible. In the course of the discussion and at any time, the Whistleblowers shall have the opportunity to provide additional information on the Complaint, to present facts or to provide evidence.

The plausibility check shall examine whether, on the basis of the facts set out in the Complaint and, where appropriate, the subsequent discussion with the Whistleblower, there is a possibility that a human rights or environmental-related risk or a violation of human rights or environmental-related obligations may have arisen or occurred as a result of the economic activity of a Lufthansa Group company or one of its direct or indirect suppliers.

## 4.4.3 MAIN PROCEDURE

If the Complaint is plausible, the Lufthansa Group examines it objectively and comprehensively, in compliance with the legal and internal regulations, and in compliance with the rights of all parties to the procedure. To this end, the Lufthansa Group may contact suppliers, ask them for assistance in the investigation or request information and documentation.

The Lufthansa Group may commission third parties to conduct the investigation who are contractually or for professional reasons obliged to objectivity and confidentiality.

The Lufthansa Group regularly informs Whistleblowers, at the latest every three months, about the status of the procedure and the further steps and the course of the procedure.

## 4.4.4 PROCEDURE CLOSURE

The appeal procedure shall be closed in accordance with the preliminary proceedings if the plausibility of the Complaint shows that it cannot be based on any human rights or environmental-related risk or on any violation of human rights or environmental-related obligations by the economic activities of a company of the Lufthansa Group or of one of its direct suppliers.

Otherwise, the appeal proceedings will be closed after the main procedure. If the investigation concludes that a human rights or environmental-related risk or violation of human rights or environmental-related obligations has arisen or occurred as a result of the economic activity of a Lufthansa Group company or one of its direct suppliers, the Lufthansa Group will take appropriate

preventive measures and, where appropriate, appropriate remedial measures. Remedial measures may be developed in exchange with the Whistleblower.

In the event that the main procedure concludes a violation of human rights or environmental-related obligations by the economic activity of a Lufthansa Group company in its own business area or with a direct supplier, the appropriate remedial and preventive measures include those that end the violation or minimize its extent and prevent a repetition of the violation.

In the event of the identification of actual indications which suggest a violation of a human rights or environmental-related obligation by an indirect supplier, the measures to be taken by the Lufthansa Group include in particular an event-based risk analysis, appropriate prevention measures and a concept for prevention, termination or minimization.

Whistleblowers shall be informed of the closure of the complaint procedure and of the outcome thereof.

After the procedure is closed, the implementation of the remedial action will be monitored by the Lufthansa Group. The results of their implementation will be evaluated. This can be done in exchange with the respective Whistleblower.

## 4.5 Protection of Whistleblowers

The Lufthansa Group guarantees effective protection of Whistleblowers against discrimination and punishment for reasons of their Complaint, as far as it is possible, within the scope of the laws. As a general rule, every complaint procedure is carried out anonymously and neither participating companies nor employees of the Lufthansa Group outside the complaint procedure nor, if applicable, affected suppliers are informed about the person of the Whistleblower or any information that allows to infer on the person of the Whistleblower.

Whistleblowers who are employees of the Lufthansa Group are protected in all companies of the Lufthansa Group from disadvantages, disciplinary measures and discrimination ("**Retaliation**") due to a Complaint. Retaliation against Whistleblowers is not tolerated and leads to disciplinary measures. If there is any indication for Retaliation because of a Complaint, the complaints office shall be informed immediately.

Whistleblowers who are not employees of the Lufthansa Group are protected by the fact that no information about their person or any information that allows to infer on the person of the Whistleblower is passed on. The Lufthansa Group will endeavor with suppliers to ensure that neither investigations into the identity of a Whistleblower are made nor that Whistleblowers are disadvantaged or punished.

## 4.6 Responsibilities

The Human Rights and Discrimination Prevention team of the Deutsche Lufthansa Aktiengesellschaft is responsible for the conduct of the complaints procedure within the Lufthansa Group, provided that Complaints relate to the economic activities of the Lufthansa Group in its own business area. If Complaints relate to the economic activities of a supplier, the

"Procurement Governance, Processes & Continuous Improvement" team of Deutsche Lufthansa Aktiengesellschaft is responsible for the conduct of the complaints procedure.

In carrying out the complaint procedure, the staff of these two teams are obliged to investigate and assess the Complaints objectively and impartially in all relevant aspects of human rights and environmental-related risks and obligations. In the course of the complaint procedure, they are not bound by instructions from the Lufthansa Group and are obliged to maintain confidentiality.

## **4.7 Data protection**

Personal data are collected, processed, transmitted and stored in accordance with the data protection regulations in the context of the complaint procedure. Section 10 (1) LkSG shall apply.

# 5 EFFECTIVENESS OF THE COMPLAINT PROCEDURE

The effectiveness of the complaint procedure shall be reviewed at least once a year and on a case-by-case basis. A case-by-case review is carried out if the Lufthansa Group has to expect a significantly changed or significantly expanded risk situation in its own business area or with its direct suppliers, for example by introducing new products, projects or a new business segment.

The review shall include, inter alia, the actual use of the complaint procedure by iWhistleblowers, compliance with these Rules of Procedure in the context of complaint procedures, the monitoring of remedial measures taken where appropriate, and any necessary adaptation of the risk analyzes required under the Supply Chain Act.

The review of the effectiveness of the complaint procedure is carried out by the human rights officer and the internal audit of the Lufthansa Group.

# 6 AUTHORIZATION, ENTRY INTO FORCE AND UPDATE

These Rules of Procedure were adopted on 21.12. 2022 by the Lufthansa Group's human rights steering committee and enter into force on 01.01.2023.

This is a translation of the „Verfahrensordnung für Beschwerdeverfahren gemäß § 8 Lieferkettensorgfaltspflichtengesetz (LkSG)“. In cases of doubt, the German version prevails.



# APPENDIX OF COMPLAINT CHANNELS

## Information on the accessibility of complaint channels

### Ombudsperson of the Lufthansa Group

Dr. Rainer Buchert

Buchert Jacob Partner Rechtsanwälte Partnerschaftsgesellschaft mbH

Phone: +49 69 710 33 33 0 or +49 6105 92 13 55

Fax: +49 69 710 34 44 4

E-mail: [kanzlei@dr-buchert.de](mailto:kanzlei@dr-buchert.de)

Website: [www.dr-buchert.de/de/ombudsmann/](http://www.dr-buchert.de/de/ombudsmann/)

Location: Kaiserstrasse 22, 60311 Frankfurt / Main, Germany

Address:

Buchert Jacob Partner Rechtsanwälte Partnerschaftsgesellschaft mbH

Dr. Rainer Buchert

Kaiserstrasse 22

60311 Frankfurt / Main Germany

Germany

### Electronic whistleblower system

Website:

<https://investor-relations.lufthansagroup.com/de/corporate-governance/compliance/hinweisgebersystem.html>

or

<https://investor-relations.lufthansagroup.com/en/corporate-governance/compliance/whistleblowing-system.html>

### E-mail

[humanrights@dlh.de](mailto:humanrights@dlh.de)

### Postal address

Deutsche Lufthansa Aktiengesellschaft

Human Rights and Discrimination Prevention, FRA CG/H

Lufthansa Aviation Center

Airportring

60546 Frankfurt / Main

Germany

# IMPRINT

**Issuing company**

Deutsche Lufthansa Aktiengesellschaft

**Department**

Corporate Compliance Office

**Status**

Dezember 2022