



# RULES OF PROCEDURE FOR COMPLAINTS

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

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# 1. FOREWORD

Respect for human rights is an integral part of the corporate culture of Deutsche Lufthansa Aktiengesellschaft, Lufthansa Technik AG, Lufthansa Cargo AG, Eurowings GmbH, Eurowings Aviation GmbH, EW Discover GmbH, Lufthansa Industry Solutions AS GmbH, Lufthansa Technik Logistik Services GmbH, Lufthansa Systems GmbH, N3 Engine Overhaul Services GmbH & Co. KG, Lufthansa CityLine GmbH, and their affiliates, on which they exert a decisive influence (together "**Lufthansa Group**"). As a globally operating aviation company, it is our goal to connect people, cultures, and economies in a sustainable way that takes into account the human rights of persons around the world. As a member of the UN Global Compact, it is important for Deutsche Lufthansa Aktiengesellschaft to reconcile entrepreneurial actions with internationally recognized principles and voluntary commitments, 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 own supply chain.

A central complaints procedure has been implemented in order to enable persons to inform the Lufthansa Group of human rights and environmental risks or violations, either within a Lufthansa Group company or one of its suppliers. With these Rules of Procedure, the Lufthansa Group establishes clear guidelines that ensure every complaint is handled carefully and transparently.

## 2. WHAT IS THE PURPOSE OF THIS PROCEDURE?

The aim of the complaint procedure is to obtain information about human rights or environmental related risks within Lufthansa Group and its suppliers, as early as possible so that the Lufthansa Group can take measures to prevent the occurrence of human rights and environmental related violations. Should a violation of human rights or environmental related obligations occur, the complaint procedure serves to grant the concerned persons access to appropriate remedial action, to the extent possible, for the Lufthansa Group. In addition, the complaint procedure supports and supplements Lufthansa Group's regular analysis 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.

# 3. WHAT IS THE SCOPE OF THE RULES OF PROCEDURE?

These Rules of Procedure shall apply to any complaint, even if anonymously transmitted, by one or more persons ("**whistleblowers**") to human rights and environmental related risks or violations within the meaning of section 2 Supply Chain Act, which have arisen as a result of the economic activities of any company of the Lufthansa Group or one of its direct or indirect suppliers within the meaning of section 8 Supply Chain Act ("**complaint**"). A list of reportable topics can be found via the link to the Electronic Whistleblower System, contained in the Appendix of Complaint Channels below.

# 4. HOW IS THE PROCEDURE STRUCTURED?

## 4.1 What principles is the procedure based on?

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

The complaint procedure shall be carried out quickly and with urgency, in a confidential and impartial manner. The identity of the whistleblower will not be shared with anyone outside of the procedure.

The Lufthansa Group has a zero-tolerance policy of retaliation towards whistleblowers and will investigate allegations of retaliation against anyone who has taken part in the complaints procedure. Appropriate measures will be implemented when necessary to ensure that a whistleblower is not punished for taking part in this process.

The complaint procedure is as transparent as possible towards the whistleblower while taking into account confidentiality obligations, data protection, and legally protected interests. The Lufthansa Group will discuss the respective complaint and the facts underlying it with the respective whistleblowers, as long as they provide information on their accessibility in the context of the complaint or set up an anonymous mailbox via the electronic whistleblower system. The whistleblowers will regularly be informed about the progress of the procedure. The whistleblower shall be notified of the conclusion of the procedure, as well as any measures adopted to minimize or eliminate any identified human rights or environmental risk.

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

## **4.2 Who can file a complaint?**

Any person may lodge a complaint with the Lufthansa Group. Complaints may be made to the Lufthansa Group via the channels described in section 4.3 of this document.

Complaints based on false allegations or any other improper use of the complaint procedure shall not be considered as a complaint within the meaning of these Rules of Procedure.

## **4.3 How can a complaint be filed?**

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 addresses, business addresses, ombudsperson) is contained in the Appendix on Complaint Channels to these Rules of Procedure. The Lufthansa Group electronic whistleblower system and the ombudsperson are available to whistleblowers in several different languages.

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 What happens after a complaint is filed?**

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.

All human rights and environmental related complaints filed via one of the channels mentioned in section 4.3 are forwarded to the Lufthansa Group Human Rights Office for an initial evaluation.

### **4.4.1 WHAT IS THE PRELIMINARY INVESTIGATIVE PROCEDURE?**

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

A whistleblower should include all the facts on which they base their complaint, including any relevant names, dates, documents, and a detailed description of the complaint.

Upon receipt, the Lufthansa Group will carefully review the complaint to determine if it is valid and relevant to human rights or environmental obligations within the meaning of section 2 of the Supply Chain Act.

Within seven (7) working days, the Lufthansa Group will acknowledge receipt to the whistleblower if a method of contact was included in the complaint.

Should the Lufthansa Group determine that a complaint is irrelevant and/or not valid, the whistleblower will be notified within the same time period that no further action will be taken.

## 4.4.2 WHAT IS THE MAIN INVESTIGATIVE PROCEDURE?

If the Lufthansa Group Human Rights Office determines that a complaint is valid and relevant, then it will forward the complaint to the relevant colleague or department and an investigation will be conducted and the whistleblower will be contacted to discuss the complaint, if a written form of contact is provided. A formal interview with the whistleblower may be requested to obtain a more detailed account of the facts, should this be deemed necessary.

The main investigative procedure may entail, on a case-by-case basis, interviews with suppliers, witnesses, or any other parties with knowledge pertaining to the complaint.

Any Lufthansa Group employee responsible for carrying out this complaints procedure is obliged to investigate and assess the complaints objectively, impartially, and with complete confidentiality.

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 shall provide the whistleblower with feedback, at the latest after three (3) months. The feedback shall contain an update on the status of the investigation and include any measures taken, planned follow-up measures, or if the proceedings have been closed due to lack of evidence or any other reason.

## 4.4.3 HOW ARE COMPLAINTS CLOSED?

Depending on the outcome of the investigative procedure, decisions will be made to adequately address any identified risks or violations with the appropriate remedial or preventive measures, up to and possibly including labor consequences for employees or the termination of business relationships with suppliers.

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 measures will be monitored by the Lufthansa Group and the results of their implementation will be evaluated. This may be done in exchange with the respective whistleblower on a case-by-case basis.

## **4.5 What does the Lufthansa Group do to protect Whistleblowers?**

The Lufthansa Group has a zero-tolerance policy for retaliation towards a whistleblower, as far as it is possible, within the scope of the law. As a general rule, every complaint procedure is carried out confidentially and no one outside of the complaint procedure is informed about the identity of the whistleblower or any information that would allow their identity to be inferred. Exceptions to this rule are only made in specific permissible cases according to Sec. 9 of the Whistleblower Protection Act.

Whistleblowers who are employees of the Lufthansa Group are protected in all companies of the Lufthansa Group from disadvantages, disciplinary measures, and discrimination due to a complaint. Retaliation against Whistleblowers is not tolerated and will be investigated when reported to the Lufthansa Group via the channels mentioned under 4.3., which may result in disciplinary measures being taken against the offending party. If there is any indication of retaliation because of a complaint, a whistleblower should notify the Lufthansa Group immediately.

The same anonymity is afforded to individuals who are not employees of the Lufthansa Group, if they wish to remain anonymous. Their identity will not be shared with anyone outside of the complaints procedure. 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 Who is responsible for the complaints procedure?**

The Lufthansa Group Human Rights Office is responsible for receiving complaints filed via the available channels. Complaints filed via the Ombudsperson will be forwarded to the Lufthansa Group Human Rights Office, anonymously, if the whistleblower chooses to withhold their identity. Whistleblowers can also file an anonymous complaint via the electronic whistleblowing system.

Complaints deemed to be valid, and related to a Lufthansa Group company, will be forwarded to the respective Human Rights Key Account for investigation/clarification.

Complaints deemed to be valid, and related to a supplier of the Lufthansa Group, will be forwarded to the respective Procurement Human Rights Key Account for investigation/clarification.

The Lufthansa Group Human Rights Office shall act as the contact point for all complaints filed via this procedure.

## **4.7 How is whistleblower data protected?**

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

## 5. IS THE EFFECTIVENESS OF THIS PROCEDURE EVALUATED?

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 expects 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 whistleblowers, 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 analysis 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, entered into force on 01.01.2023, and first updated on 14.03.2024.

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



# 7. 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: <https://www.dr-buchert.de/en/Ombudspersons-Ombudsman-Ombudswoman/>

Location: Kaiserstrasse 22, 60311 Frankfurt / Main, Germany

Address:

Buchert Jacob Partner Rechtsanwälte Partnerschaftsgesellschaft mbH

Dr. Rainer Buchert

Kaiserstrasse 22

60311 Frankfurt / Main Germany

Germany

For more information on accessible languages and countries from which you may file a complaint, please see the following link:

[Ombudsman - Lufthansa Group Investor Relations](#)

### Electronic whistleblower system

Website:

<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

# 8. IMPRINT

**Issuing company**

Deutsche Lufthansa Aktiengesellschaft

**Department**

Lufthansa Group Human Rights Office

**Status**

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