

Rules of procedure for the complaints procedure under the Supply Chain Due Diligence Act

Status: October 2026

Our Commitments

General information	The companies[1] of the Andreas Schmid Group actively implement the requirements of the German Supply Chain Duty of Care Act (LkSG) so that compliance with human rights and environmental standards can be adequately guaranteed in our supply chains and in our own business operations. Section 8 of the LkSG requires the establishment of a complaints procedure. The procedure enables internal and external persons to report human rights and environmental risks and violations of human rights or environmental obligations. The specific details and procedures of this complaints procedure at the Andreas Schmid Group are set out in these rules of procedure in accordance with the LkSG.
Who can report and what can be reported?	In principle, any person is entitled to report complaints or information within the meaning of the LkSG. Human rights and environmental risks and violations of human rights or environmental obligations in the company's own business area and in the supply chain can be reported. These include in particular • Slavery • Economic exploitation • Forced or child labor • Disregard for occupational health and safety and work-related health hazards • Disregard for freedom of association • Unjustified unequal treatment in the employment relationship • Violation of minimum wage regulations • Destruction of the natural basis of life through environmental pollution • Unlawful violation of land rights • Commissioning or using private or public security forces in violation of human rights

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- Other actions or omissions in breach of duty that seriously impair protected legal positions
- Failure to comply with environmental protection bans (Minamata Convention[2], POPs Convention[3], Basel Convention)[4]

[2] Minamata Convention
[3] POPs Convention
[4] Basel Convention

What complaint channels are available?	You can use our complaints platform to submit complaints or information. This can be reached via the following link: https://andreas-schmid-group.hinweis.digital/ Use is free of charge for whistleblowers. In addition to the internal announcement, the complaints channel can also be accessed via the link published on our website. The Andreas Schmid Group uses the DPMS complaints platform, which is ISO27001 certified and operated exclusively in German data centers, as a complaints channel. SONNTAG IT Solutions GmbH & Co. KG acts as the person entrusted with the complaints procedure by accepting the reports submitted via the DPMS complaints platform as a neutral body and getting in touch with the contact persons of the Andreas Schmid Group.
How does a complaints procedure work?	After submitting a report or complaint: (1) the Reporting Office confirms receipt of a report to the whistleblower within seven days at the latest, (2) the Reporting Office checks whether the reported violation falls within the material scope of the LkSG; in the event of a rejection, the whistleblower receives a justification, (3) the Reporting Office contacts the whistleblower and informs him/her about the expected timeline of the complaints procedure and his/her rights with regard to protection against discrimination or punishment, (4) the Reporting Office checks the validity of the report received; if necessary, the reporting person is offered a procedure for amicable dispute resolution at this point, (5) the Reporting Office requests further information from the whistleblower if necessary and works with the whistleblower to develop proposals for follow-up measures as described in the LkSG, and (6) MROS takes appropriate follow-up measures and (7) the Reporting Office assesses the result achieved with the reporting person. There is generally a seven-year retention period for incoming reports.
Effectiveness of the complaint's procedure	The effectiveness of the complaints procedure is reviewed at least once a year or on an ad hoc basis.

	Evaluations from the information received to date and the subsequent procedures as well as from regular analyses are incorporated for the purposes of improvement and prevention. The BAFA guidelines on the complaints procedure are taken into account.
Protection of anonymity and against discrimination/ Punishment due to a complaint	It is possible to submit a report or complaint anonymously via our reporting platform. The technical anonymity of the whistleblower is guaranteed by the complaints channel. The identity of the whistleblower cannot be traced by technical means. The confidentiality of the whistleblower's identity is also guaranteed in the case of non-anonymous submission of information or reports. All data protection regulations, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG), apply to the processing of personal data by reporting offices. The complaints channel also acts impartially and is therefore independent and not bound by any instructions from the Andreas Schmid Group. Whistleblowers may not be personally or legally disadvantaged or penalized because of a tip-off or complaint