



# Complaints procedure under the German Supply Chain Due Diligence Act<sup>1</sup>

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<sup>1</sup> Gesetz über die unternehmerischen Sorgfaltspflichten in Lieferketten (Lieferkettensorgfaltspflichtgesetz) vom 16. Juli 2021



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## Scope

The German Supply Chain Due Diligence Act (SCDDA) requires companies, including Deutsche Bank, to ensure that certain duties of care relating to human rights and the environment are complied with by Deutsche Bank and its direct or indirect suppliers.

This document sets out Deutsche Bank's process under the SCDDA for individuals who wish to report concerns about human rights and the environment in Deutsche Bank's supply chain.

The reporting process is open to any individual, both internally or externally, who has concerns regarding potential issues within Deutsche Bank's supply chain.

Deutsche Bank requires that its vendors along the supply chain also adhere to this document and provide employees with the relevant means to raise a concern.

## What types of concerns can I raise?

The types of concerns that can be raised under the SCDDA are broad but can generally be described as referring to any past, present, or future environmental or human rights related concerns regarding Deutsche Bank or any of its direct or indirect suppliers in the Deutsche Bank supply chain (in Germany or abroad).

This would include, by way of example, any concerns with regards to:

- prohibition of employing children where this is prohibited by law and any type of child labor or forced labor;
- slavery or similar practices, including the sale and trafficking of children or offering children for illicit activities, including prostitution, pornography, and the trafficking of drugs;
- oppression in the workplace, such as economic or sexual exploitation or humiliation;
- safety and health in the workplace, including insufficient safety standards to protect workers;
- the freedom of association, in particular the forming or joining of trade unions and the right to strike;
- unequal treatment in employment, including on the grounds of national, ethnic, and social origin, sexual orientation, age, disability, health status, gender, political opinion, religion, or belief, which includes, unless justified by the requirements of employment, the payment of unequal remuneration for work of equal value;
- the prohibition of withholding an adequate living wage in accordance with national and/or local laws;
- the prohibition of causing any harmful soil change, water pollution, air pollution, harmful noise emissions, or excessive water consumption, thereby harming the preservation, production, and access to food, safe and clean drinking water, or sanitary facilities, or generally harming people's health;
- the prohibition of unlawful eviction and the prohibition of unlawfully taking land, forests, and waters in the acquisition, development, or other use of land, forests, and waters;
- any other environment-related risk, such as, for example, the prohibition of manufacturing mercury-added products prohibited by law, as well as risks related to hazardous waste or other wastes that are not managed in an environmentally sound manner.

## How can I report a concern and what information should I provide?

If you wish to report a concern with regards to human rights or the environment in Deutsche Bank's supply chain as outlined above, you may reach out to Deutsche Bank via two dedicated channels:

- Via email: [report.misconduct@db.com](mailto:report.misconduct@db.com)
- Via phone (below numbers direct to a voicemail):
  - For English, please call: +496991045289
  - For German, please call: +496991030567

Your report should contain the following minimum information to allow for appropriate follow-up:

- Where did the issue occur?
- When did the issue occur?
- Who is the involved supplier?
- Description of potential concerns according to Section *What types of concerns can I raise?*



- Can we contact you directly?
  - If so, what is your preferred means of communication?
  - When can we return your call (please give us at least two options)?

If you are reporting a concern, you may choose to remain anonymous. However, please note that anonymity cannot be claimed once a name has been given.

## How will my report be treated?

Deutsche Bank will evaluate each report to determine if the concerns fall under the remit of the SCDDA.

## Who will see my report?

The Whistleblowing Central Function (WBCF) has dedicated personnel in Frankfurt and in London and is the recipient of reports via the dedicated channels as outlined in this document. If possible and applicable, the WBCF will refer a report that falls under the scope of this document to Group Sustainability to follow-up on the questions raised and/or take any actions deemed appropriate. Reports are treated confidentially and will only be forwarded to individuals who have a need to see the report in order to address the concerns raised. In rare circumstances, Deutsche Bank may be required to disclose the identity of the reporter outside of the individuals dealing with the report, including to third parties (regulatory, governmental, law enforcement or self-regulatory agencies).

## When can I expect a reply to my report?

If you have sent us your report directly via one of the channels mentioned in Section *How can I report a concern and what information should I provide?* How can I report a concern and what information should I provide? and if you have provided us with a means of communication, Deutsche Bank will, where appropriate and feasible:

- Acknowledge your report within seven days.
- Reach out to you again, if allegations are not sufficiently specific to allow effective assessment of a report.
- Provide you with proactive high-level status updates within approximately three months of receiving a report.
- Where review of the report takes longer, Deutsche Bank will aim to provide you with a quarterly status update.

## Do I have to fear any consequences for raising a report?

Deutsche Bank prohibits any form of retaliation against any individual or organization raising a concern under the SCDDA or otherwise assisting with the review and resolution of such a concern.

Retaliation can differ under applicable law, but generally refers to an adverse action (or inaction), including threats of and attempts at retaliation, in a professional context, the reason for which is that an individual raised a concern. Examples of adverse actions may include, but are not limited to, suspension, discipline, demotion, negative impact on compensation, or termination. In some cases, retaliation may take more subtle forms (e.g., reassigning an individual or limitation of opportunities/responsibilities, or any form of harassment and discrimination) that are intended to penalize a person for having raised a concern.

If you have any concerns regarding retaliation, or you think you might have experienced retaliation for raising a concern, please also reach out via the abovementioned channels.

## What remediation actions will be taken following my report?

Severe impacts will always trigger a remediation process that includes investigative steps, research, and consultation on the alleged issue. Considering the outcomes of such a due diligence, measures will be agreed on a case-by-case basis and implemented to remediate existing impacts as appropriate. These measures will



be monitored systematically over time. Additionally, Deutsche Bank ensures that any complaints are addressed according to Deutsche Bank's Client Complaints Policy, which ensures involvement of business divisions and effective tracking of incidents.