



Complaints Procedure Regulation (LkSG)



COMPLAINT AND REPORTING PROCEDURES



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Prologue

BHS Corrugated is obliged to implement the regulations of the German Supply Chain Act as of 01 January 2024. This obligates us to enforce certain due diligence measures to ensure that both our own business activities and the supply chain are responsible regarding human and environmental rights. Therefore, a potentially affected person must be given access to effective and transparent internal and external reporting channels for making complaints and reports.

All reports and complaints submitted must be handled in a fair and transparent manner. This applies to us and our suppliers worldwide to ensure fair, safe, and healthy working conditions in the global supply chain.

To ensure this, we would like to be informed about illegal behaviour in our company to clarify and stop such behaviour. This is primarily about the protection for us and for the company against potential (liability) risks and financial damage.

Complaint and reporting procedures

1. Does BHS Corrugated have a companywide procedure?

BHS Corrugated has a companywide, transparent, public, and unified complaint and reporting procedure.

2. Who can submit complaints and reports?

The complaint and reporting channel is accessible to everyone, which means that anyone can submit a report or complaint.

3. Which complaints can be submitted?

Actual or suspected violations of laws and internal regulations, including those relating to human rights and environmental risks, as well as our Code of Conduct, can be reported. Please only submit complaints and reports if you are convinced that they are correct.

4. Will my identity be treated confidentially?

Yes, your identity will be kept confidential. All complaints and reports are reviewed confidentially and can also be submitted anonymously.

It is important to us that reporters are protected. Therefore, confidential data may only be disclosed if this is necessary and legally permissible.

5. Are there any consequences if I give a hint?

No, because by filing a report or complaint, you help to clarify and eliminate misconduct and wrongdoing. All information will be processed confidentially and in accordance with the applicable laws.

You must only expect consequences if you claim untrue facts about other persons against your better knowledge.

6. Procedure

The complaint procedure shall follow the following pattern:

a) Receipt of a report or complaint

When submitting a report or complaint, you will receive an acknowledgement of receipt within 7 days at the latest.

b) Examination procedure

During the first examination procedure, an assessment is made as to whether a risk to human rights or environmental law can be identified in the facts presented, or whether other violations have occurred.

This also involves analyzing whether sufficient information is available for further investigation. If this is not the case, the complainant should be contacted, if possible, or the missing information must be obtained elsewhere.

If this is also not possible or if there are further gaps, the report or complaint will not be accepted and the complainant will be informed of this, stating reasons.

c) Clarification of the facts

In the event of an accepted complaint, it is forwarded to the department responsible for the individual case or to the Compliance Officer. The responsible employees are trained to carry out this review, are independent of instructions, are obligated to act impartially, and are sworn to secrecy. In the further course of the audit, the facts of the case are discussed, also including the complainant, and possible preventive and remedial measures are decided upon.

d) Preventive and remedial measures

If the investigation of a complaint or report reveals a human or environmental rights risk or a breach of duty, appropriate remedial action should be taken.

e) Conclusion of the examination

The complainant should be informed about the conclusion of the examination and receive a brief overview of the results. In addition, it is the responsibility of the responsible department or the Compliance Officer to monitor the implementation of and compliance with the agreed preventive and remedial measures.

f) Monitoring

The procedure is generally monitored and reviewed once a year or when there are indications of possible violations or weaknesses.

7. Contact information

Suggestions and complaints, in particular indications of gross violations of the applicable law in the BHS Group, our Code of Conduct or Group guidelines can be reported to the following offices or persons (in person, electronically, in writing or by telephone).

- Supervisor
- Works Council
- Compliance Officer
 - o compliance@bhs-world.com

- Ombudsman
 - Dr. Thomas Altenbach
 - Tel.: +49 69 24 70 97 – 35
 - E-Mail: ombudsmann-bhs-corrugated@actlegal-act.com
- Anonymous whistleblower platform: [Here you can reach the Integrity Channel](#)