

Rules of Procedure for the Complaints Procedure under the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

This document is the rules of procedure of Deutsche Leasing AG (hereinafter: “Deutsche Leasing”) for handling complaints according to the LkSG (hereinafter: “Complaints Procedure”). The rules of procedure describe the complaints procedure established by Deutsche Leasing to ensure compliance with human rights and environmental due diligence obligations within the meaning of the LkSG.

1. Pointing out person

The complaints procedure allows potentially affected persons to indicate human rights and environmental risks or violations (hereinafter “Whistleblower”). Potentially affected persons are persons who are directly affected by economic activities in Deutsche Leasing's own business area or by economic activities of a direct or indirect supplier of Deutsche Leasing or who may be injured in a protected legal position, as well as persons who have knowledge of the possible violation of a protected legal position or an environmental obligation. This includes, for example, employees of Deutsche Leasing, employees of direct or indirect suppliers and business partners as well as customers of Deutsche Leasing.

2. Complaints office

Deutsche Leasing ensures through appropriate personnel, organizational and technical measures that the confidentiality of the identity of whistleblowers is maintained for incoming complaints and tips and that effective protection against disadvantage or punishment due to a complaint is guaranteed. The persons entrusted with the complaints procedure are obliged to maintain confidentiality and to comply with data protection. Confidentiality applies to the whistleblower, the person who is the subject of the complaint and other persons named in the complaint. The ombudsperson is subject to the lawyer's duty of confidentiality.

Deutsche Leasing has a whistleblower system that can be used to report white-collar crime and violations of legal, regulatory and internal requirements. This system can also be used to report human rights and environmental risks and violations. In addition, Deutsche Leasing has set up an external ombudsperson as a complaints office for complaints according to the LkSG.

[Whistleblowing System - Deutsche Leasing \(deutsche-leasing.com\)](https://www.deutsche-leasing.com)

3. Course of the complaint procedure

3.1 Acknowledgement of the tip-off

The whistleblower will receive confirmation of receipt of the complaint from Deutsche Leasing's complaints office or the ombudsperson within 5 working days.

Information received by the ombudsperson will be forwarded to Deutsche Leasing's complaints office after the whistleblower's consent (release from the lawyer's duty of confidentiality). If the whistleblower does not wish to disclose their identity, the

ombudsperson remains the sole point of contact throughout the entire complaints procedure.

If the complaint is made anonymously and this anonymity or the deliberate or unintentional provision of false contact details makes it impossible to contact the whistleblower, Deutsche Leasing is not obliged to identify the whistleblower in order to comply with its obligations regarding communication.

3.2 Clarification of facts and statement

The complaints office of Deutsche Leasing will determine if the complaint falls within the scope of the complaint procedure according to LkSG.

3.3 Rejection of the complaint

If the complaint does not fall within the scope of the complaint procedure according to LkSG, the whistleblower will be notified within two weeks of receipt of the complaint.

As a rule, reasons for the rejection are provided to the whistleblower. However, an explanation of the reason why Deutsche Leasing considers the complaint to be unfounded is not provided if the complaints office is prevented from doing so for legal, regulatory or factual reasons.

3.4 Follow-up of the complaint

If the complaint falls within the scope of the complaints procedure according to LkSG, Deutsche Leasing's complaints office will clarify the facts of the case, if necessary with the involvement of the departments and business units concerned within Deutsche Leasing, and will respond to the whistleblower within three months at the latest.

If the investigation of the facts reveals that the information provided by the whistleblower is not sufficient or not relevant for further clarification of the complaint, the complaints office will inform the whistleblower of this and request further information. In such cases, the processing period may be extended by one month, in particular if this is necessary for further clarification of the facts. If necessary, the complaint office will discuss the facts of the case with the whistleblower with the aim of gaining a better understanding of the facts of the case.

3.5 Possible violation of law

If the investigation of the complaint reveals that the violation of human rights or the environment in Deutsche Leasing's own business area or at a direct or indirect supplier of Deutsche Leasing appears possible, is imminent or has already occurred, Deutsche Leasing will initiate appropriate preventive and/or remedial measures. The aim of these measures is to avoid a violation of protected legal positions or to minimize or remedy violations of protected legal positions that have already occurred.

4. Review of effectiveness and adjustment

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis.

5. Documentation and storage

The respective complaint process is documented and retained in accordance with legal requirements.

6. Costs and language

The procedure is free of charge for the whistleblower. Complaints received in a foreign language and correspondence with the whistleblower will be translated free of charge.