

Rules of procedure for the complaints procedure pursuant to section 8 of the German Supply Chain Act (LkSG)

The Fraunhofer-Gesellschaft assumes responsibility for respecting and strengthening internationally recognized human rights within its own facilities and through appropriate management of its supply chains. The Fraunhofer-Gesellschaft and its institutions implement all requirements of the German Supply Chain Act in order to fulfill human rights and environmental due diligence obligations and ensure their implementation. A key element of these due diligence obligations is the establishment of an effective complaints procedure through which information on human rights and environmental risks or violations can be submitted.

The Fraunhofer-Gesellschaft has therefore expanded its existing BKMS® whistleblower system to include a channel through which reports of violations of the Supply Chain Act can be processed systematically and consistently.

These rules of procedure set out the main features of the complaints procedure, including access to the procedure and responsibilities. It also provides information on how incoming information and complaints are handled, i.e. how the complaints procedure is carried out. The Fraunhofer-Gesellschaft and its institutions attach great importance to presenting this information in a comprehensible and transparent manner in order to provide the greatest possible clarity about the process.

What is the aim of the complaints procedure?

The complaints procedure is intended to enable any person or group of persons to submit relevant complaints or information to the Fraunhofer-Gesellschaft and its facilities in order to draw attention to human rights and environmental risks.

Who is the complaints procedure aimed at? Who can submit complaints or reports?

Any person, regardless of whether they are in Germany or abroad, can submit complaints and reports.

Why should I submit a report?

As the largest organization for application-oriented research in Europe, we have a social responsibility. A positive and open organizational culture therefore naturally includes compliance with legal and internal regulations.

We share responsibility for implementing the Fraunhofer-Gesellschaft's principles of action. Perhaps you are aware of harmful behavior or risks that endanger the Fraunhofer-Gesellschaft. By informing us, you help us to avoid financial or reputational damage and thus contribute directly to the sustainable success of the Fraunhofer-Gesellschaft!

We want to effectively protect you as a whistleblower and offer you a communication platform secured with the latest technologies for submitting reports by name or anonymously. By setting up an anonymous mailbox, you can actively participate in the investigation.

What types of reports or complaints can be submitted?

The complaints procedure enables individuals to report human rights and environmental risks or violations that have arisen as a result of the business activities of the Fraunhofer-Gesellschaft and its institutions in their own business area or in the supply chain.

Where can I find the Fraunhofer whistleblower system?

The following link will take you directly to the homepage of the Fraunhofer whistleblower system:

<https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=6Fh8&c=-1&language=eng>.

How can I submit a report via the BKMS® system and how do I set up a mailbox?

If you would like to submit a named or anonymous report, click on the "Submit report" button at the top left of our introductory page.

The reporting process comprises 4 steps:

1. First you will be asked to read a text containing information to protect your anonymity and to answer a security question.
2. On the following page, you will be asked about the focus of your report. Here you select the option "Violations of the scope of protection set forth in the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz, LkSG)".
3. On the report page, you formulate your report in your own words and answer questions about the case using a simple answer selection. You have 5000 characters available for the free text, which corresponds to a full page. You can also send a file in .docx or .pdf format of up to 10 MB in size to support your report. Please remember that documents may contain information about the author. After submitting your report, you will receive a reference number as proof that you have sent this report.
4. Please then set up your own protected mailbox. This is where you will receive feedback from us, answer questions and be informed about the progress of your report. Discussions according to the Supply Chain Act will also take place via this channel. If you chose to set up a protected mailbox, you will receive confirmation of receipt of your complaint withing seven days.

Setting up a mailbox is voluntary. Please bear in mind that we will not be able to contact you to ask any questions necessary to clarify the facts if you do not set up a mailbox. This may mean that the report cannot be followed up on due to a lack of sufficient information.

If you already have a protected mailbox, you can access this mailbox directly via the "Login" button. Here too, you must first confirm the security prompt.

So long as you do not enter any data that could be used to identify you, the BKMS® system will protect your anonymity.

We assure you that we are only interested in the case you have reported. The aim is to uncover grievances and avert financial losses.

Who is responsible for processing complaints and reports?

The information is initially received via the system by our compliance department, which is in charge of processing the information or delegates this to the specialist department responsible for the specific case, where the information is processed systematically and consistently.

How do I get feedback while remaining anonymous?

The overriding principle of the BKMS® procedure is the protection of the whistleblower. The functionality of the anonymity protection is certified by an independent body.

When setting up your protected mailbox, you choose your own pseudonym/username and password. Your report is kept anonymous by encryption and other special security routines. You will not be asked for personal details at any time during the reporting process. Do not enter any data that could be used to identify you. Please do not use a PC provided by Fraunhofer to submit your report.

Via the protected mailbox, a processor will give you feedback on what is happening with your report or ask questions if details are still unclear - you will remain anonymous during the dialog. We are interested in reports to prevent damage, not in you as the whistleblower.

Is it possible to submit reports and complaints by mail?

You can also send in information about risks and violations as defined by the LkSG by letter. Please note that we will of course also investigate anonymous reports submitted by regular mail, but we have no way of involving you as a whistleblower in the further process.

Please use the following postal address:

Fraunhofer-Gesellschaft e.V.
Department B1 Strategy Supply Chain Management
Hansastraße 27c
80686 München
Germany

Legal information:

The complaints procedure and, in particular, the discussion pursuant to section 8 para. 1 sentence 4 of the German Supply Chain Act does not constitute a negotiation that suspends the statute of limitations pursuant to Section 203 BGB or corresponding provisions of the law applicable to claims for damages. The proceedings do not primarily serve to enforce the individual rights of the persons concerned.