



**ODDO BHF**

## *Grievance mechanism under* the German Supply Chain Due Diligence Act

The German Supply Chain Due Diligence Act (LkSG) obliges companies, including ODDO BHF, to ensure that specific due diligence obligations related to human rights and environmental risks are adhered to both within ODDO BHF's own operations and throughout the supply chain. This document outlines ODDO BHF's processes for internal and external stakeholders wishing to report concerns related to human rights and environmental risks within ODDO BHF's operations and the supply chain. ODDO BHF also mandates its suppliers throughout the entire supply chain to comply with these guidelines and provide their employees with appropriate channels for reporting concerns.

### **1. What types of complaints or reports can I submit?**

Any indications of possible violations of laws and/or regulations, including human rights abuses or environmental risks or violations both within the company's own operations and along the supply chain can be reported using the whistleblower procedure.

### **2. How and to whom can I report complaints or concerns?**

Our organization takes reports of (possible) crimes or misconduct seriously and thoroughly investigates them. If you have concerns regarding human rights or environmental violations within ODDO BHF's own operations or along the supply chain, you can report to our external Ombudsman, Dr. Rainer Buchert, via mail, email, or phone. Here are the contact details:

Rechtsanwalt  
Dr. Rainer Buchert  
Kaiserstraße 22  
60311 Frankfurt am Main  
Tel.: +49 69 710 33330  
Tel.: +49 6105 921355  
E-Mail: dr-buchert@dr-buchert.

The ombudsman advises and supports whistleblowers, serving as a neutral and independent contact person. The identities of whistleblowers are protected, and communication with the ombudsman is treated as strictly confidential. Employees can also approach their supervisors or local compliance contacts.

### **3. How does the complaint procedure work?**

Information or grievances can be presented through a confidential personal or telephone conversation, and if necessary, via email, to the ombudsman. Subsequently, an initial assessment and evaluation will be conducted by the attorney. During the conversation with the whistleblower, the ombudsman will assess the coherence of the presented facts and, if needed, clarify details with the whistleblower to ensure that the information is complete. This will enable targeted investigations into the alleged offense by ODDO BHF. Receipt of the report will be confirmed to the whistleblower within 7 days at the latest; feedback regarding planned and implemented follow-up actions concerning the report will generally be provided within a maximum of 3 months after receipt confirmation.

#### 4. Do I have to fear any consequences for submitting a report?

Due to attorney-client confidentiality, attorney-client privilege, and additional contractual regulations, the identity of the whistleblower is generally protected and will not be disclosed to ODDO BHF upon the whistleblower's request. Whistleblowers are safeguarded by the Whistleblower Protection Act (HinSchG) and are not subject to retaliation or other disadvantages due to their report. However, this protection does not apply to deliberate or grossly negligent false reports.

If a whistleblower suffers any disadvantage related to their professional activities, the burden of proof lies with the employer to demonstrate that the disadvantage is based on sufficiently justified reasons or has no connection to the report or disclosure (reversal of the burden of proof).

Documentation must be deleted 3 years after the completion of the procedure. Important Note: We emphasize that ODDO BHF cannot guarantee whistleblower protection from law enforcement authorities or other governmental entities.