

# Rules of procedure complaints management



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# **Rules of procedure for complaints management under the Supply Chain Due Diligence Act (LkSG) within the Autobahn Tank & Rast Group GmbH & Co.KG**

## **Scope of application of complaints management**

The complaints management system applies to Autobahn Tank & Rast Gruppe GmbH & Co. KG and all of its affiliated companies and covers all economic activities which a determinative influence is exercised. The procedure is intended to make it possible to draw attention to human rights or environmental risks or breaches of duty in accordance with the LkSG. It is open to all employees of the aforementioned Group companies as well as employees of direct and indirect suppliers and other persons who have knowledge of a human rights or environmental risk or the violation of a human rights or environmental obligation. Complaints management, for which the following rules of procedure have been established, is carried out regularly, e.g. at least annually and on an ad hoc basis, on its effectiveness and requirements and if necessary adjusted accordingly.

The most important information on complaints management is presented below in an understandable, comprehensible and transparent manner.

## 1

### What kind of complaints and information can our complaints management system be used for?

The complaints management system can be used to report all indications of possible violations of laws and/or regulations, including human rights or environmental risks or violations relating to the company's own business area and along the entire supply chain.

## 2

### These include in particular

- violation of the ban on child labor,
- violation of the ban on forced labor and all forms of slavery,
- disregard for occupational health and safety and work-related health hazards,
- the disregard for freedom of association and the right to collective bargaining,
- violation of the prohibition of unequal treatment in employment,
- violation of the ban on withholding a fair wage, destruction of the natural basis of life through environmental pollution,
- the unlawful violation of land rights,

Environmental risks or breaches of duty arise in particular from

- in connection with mercury,
- and hazardous waste.

## 3

### Which channels can you use to submit complaints?

Via the electronic whistleblower system <https://sicher-melden.de/tankundrast>. The input mask is available in German and English. It is free of charge and can be reached around the clock.

**By post** or by **e-mail** to the Compliance Department at the following address  
Autobahn Tank & Rast Group GmbH & Co.KG  
Abt. Compliance (confidential)  
Andreas-Hermes-Str. 7-9  
53175 Bonn  
Mailto: [Compliance@tank.rast.de](mailto:Compliance@tank.rast.de)

Employees can also contact their superiors.

## 4

### How are indications of a violation handled?

Regardless of which communication channel is chosen, we treat all information confidentially. However, we are required to comply with statutory obligations to provide information to authorities and statutory exceptions to the confidentiality requirement. The confidentiality of the identity of the whistleblower and the other involved in the notice shall be maintained throughout the entire process.

All information is processed by selected and specially trained employees of the Compliance Department (hereinafter referred to as **Complaints Office**). They are impartial, independent in the performance of their duties and bound to secrecy. They are also obliged to comply with data protection regulations and to ensure transparency and the rights of all data subjects.

## 5

### How are whistleblowers protected?

The protection of whistleblowers against discrimination or punishment based on complaints or information provided, is an important part of our complaints management. Attempts at intimidation and reprisals against persons who report actual or suspected misconduct in good faith will not be tolerated.

If you have the impression that you are suffering intimidation or reprisals as a result of your report, please contact the Complaints Office; such intimidation or reprisals will also be investigated in accordance with the procedures outlined above and, if necessary, corrected.

Insofar as whistleblowers are affected who are employees of a direct supplier, the company endeavors to make appropriate contractual arrangements with the supplier.

## 6

### What happens after I have submitted information?

#### 6.1 Receipt of the notice

Once a report has been received, its receipt is documented internally and the person filing the report receives a confirmation of receipt within one week.

#### 6.2 Examination of notice

The complaints office first checks whether sufficient information is available to examine and investigate the reported facts.

If this is not the case, the complaints office will, if possible, contact the whistleblower to request further information. If neither sufficient information is available nor contact can be made, the case will be closed.

### **6.3 Clarification of facts**

The complaints office shall investigate the matter comprehensively itself or forward it to the responsible department, e.g. within the company for further investigation, taking into account the principles of confidentiality and data protection. If necessary and as far as possible in the case of anonymous reports, the complaints office or the involved department will discuss the facts of the case with the whistleblower and may ask for further information.

If, after clarification of the facts, discussion and investigation, the complaints office or the responsible department is convinced that there are no human rights or environmental risks or violations of human rights or environmental obligations in its own business area or at suppliers, the case will be closed.

### **6.4 Development of solutions**

If, in the opinion of the complaints office or the if the responsible department confirms that human rights and environmental risks or violations of human rights or environmental obligations in its own business area and with suppliers, a proposal for further action (in particular preventive and remedial measures) is drawn up. Where possible and appropriate, the whistleblower is involved.

### **6.5 Implementation and follow-up**

The implementation of the proposed solution is ultimately carried out by the complaints office or of the responsible department.

### **6.6 Conclusion of the procedure**

The whistleblower will be informed of the conclusion of the complaints management process, if the possibility of contact exists.

The processing time is highly case-dependent and can therefore take anywhere from a few days to several months. However, we are endeavoring to complete the investigation promptly.

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