

NORD/LB's rules of procedure for the whistleblower procedure under the German Supply Chain Due Diligence Act

Status: May 2024

This document is the procedural rules of Norddeutsche Landesbank - Girozentrale - (hereinafter referred to as "NORD/LB") for dealing with whistleblowing under the German Supply Chain Due Diligence Act¹ (hereinafter: Whistleblower Procedure under the German Supply Chain Due Diligence Act) and describes the possibilities for whistleblowers (employees of NORD/LB and external persons) to report information, tips or complaints in connection with the provisions of the Supply Chain Due Diligence Act.

1. Persons providing information

The whistleblowing procedure under the German Supply Chain Due Diligence Act enables potentially affected persons to report human rights and environmental risks or violations (hereinafter "whistleblower"). Potentially affected persons are persons who:

- through economic activities in NORD/LB's own business division or
- are directly affected by economic activities of a direct or indirect supplier of NORD/LB or
- may be violated in a protected legal position
- as well as persons who are aware of the possible violation of a protected legal position or an environmental obligation.

2. Report to the ombudsperson

All whistleblowers have the opportunity to report their information to NORD/LB via an ombudsperson.

The NORD/LB ombudsperson is [Dr Rainer Buchert](#), who is a lawyer and therefore has a duty of confidentiality and a right to refuse to testify. This means that it is also possible to submit an anonymous report.

All information on the NORD/LB ombudsperson is published on the website <https://www.nordlb.com/legal-notice/fraud-prevention>.

3. Reporting channel for a "Report on the German Supply Chain Due Diligence Act" on the NORD/LB website

Information can also be reported directly to NORD/LB.

NORD/LB has set up a Notes/Complaints to NORD/LB section on its website: [Submitting a note/complaint to NORD/LB: NORD/LB \(nordlb.com\)](#).

¹ The German Supply Chain Due Diligence Act is available online at: <https://www.gesetze-im-internet.de/lksg/>

A contact option is provided in this area, which the person providing the information can use to provide information about their tip. By selecting the "Send" button, the text is sent by e-mail to the "whistleblower". All tips can be reported with attribution.

The "whistleblower officer" is the exclusive contact person for the whistleblower throughout the entire whistleblowing procedure, in this regard the human rights officer of NORD/LB.

The human rights officer guarantees impartiality and acts independently and not bound by instructions within the scope of his/her function.

4. Procedure of the whistleblower procedure according to the German Supply Chain Due Diligence Act

a. Confirmation of the note

The whistleblower or the ombudsperson will receive confirmation of receipt of the report by e-mail within 5 working days. If the report is made anonymously in such a way that it is impossible to contact the person making the report or by (un)consciously providing false contact details, NORD/LB is not obliged to identify the person making the report in order to fulfil its obligations regarding communication.

b. Clarification of facts and opinion

The human rights officer checks whether the information falls within the scope of the whistleblower procedure under the German Supply Chain Due Diligence Act.

(1) Rejection of the notice

If the information does not fall within the scope of the whistleblower procedure under the German Supply Chain Due Diligence Act, the whistleblower or the ombudsperson will receive a corresponding report within two weeks of receiving the information.

As a rule, the whistleblower or the ombudsperson will be given reasons for the rejection. NORD/LB will not explain the reason why it considers the whistleblower's report to be unfounded if the whistleblowing office is unable to do so for legal, official or factual reasons.

(2) Follow-up of the tip

If the information falls within the scope of the whistleblower procedure under the German Supply Chain Due Diligence Act, the human rights officer will clarify the facts of the case and respond to the whistleblower or the ombudsperson within three months at the latest.

If the investigation of the facts reveals that the factual information provided by the whistleblower or the ombudsperson is not sufficient or not relevant for further clarification of the whistleblowing matter, the human rights officer shall inform the whistleblower or the ombudsperson of this and request further information.

If necessary, the human rights officer will discuss the facts of the case with the whistleblower or the ombudsperson with the aim of gaining a better understanding of the facts of the case.

c. Possible infringement

If the review of the information indicates that a breach of the German Supply Chain Due Diligence Act-related obligation in NORD/LB's own business division or at a direct or indirect supplier appears possible, is imminent or has occurred, NORD/LB shall initiate appropriate preventive and/or remedial measures. The aim of these measures is to avoid a breach of protected legal positions or to minimise or remedy breaches of protected legal positions that have already occurred.

d. Review of the effectiveness of the whistleblower procedure under the German Supply Chain Due Diligence Act

The effectiveness of the whistleblower procedure in accordance with the German Supply Chain Due Diligence Act is reviewed once a year and on an ad hoc basis.

5. Documentation and storage

The respective whistleblowing process is documented and stored in accordance with legal requirements.

6. Data protection and confidentiality

NORD/LB takes appropriate personnel, organisational and technical measures to ensure that the confidentiality of the identity of whistleblowers is maintained when information is received and that effective protection against discrimination or punishment on the basis of information provided by the whistleblower is guaranteed. The persons entrusted with the whistleblowing procedure under the German Supply Chain Due Diligence Act are obliged to maintain confidentiality and to comply with data protection. Confidentiality applies to the whistleblower, the person(s) who is/are the subject of the report and other persons named in the report.

7. Costs

The procedure, including contact with the ombudsperson, is free of charge for whistleblowers.