

SNIPES
Rules of Procedure
on the complaints procedure
according to Section 8 Paragraph 2 Act on Corporate Due Diligence
Obligations in Supply Chains
(in German: Lieferkettensorgfaltspflichtengesetz, LkSG)

1. Establishment of a complaints procedure

In the sense of responsible business along the entire value chain, especially the supply chain affected, our partners and the SNIPES Group undertake to comply with all relevant legal regulations and thus, above all, to respect human and environmental rights. If, however, human rights or environment-related risks or violations of human rights or environment-related obligations should occur in this context, the introduced and publicly accessible complaints procedure enables all persons to anonymously and easily submit or report information (cf. section 8 (1) and (2) LkSG).

2. Sense and purpose of the complaints procedure

The complaints procedure therefore enables persons to point out, above all, human rights and environment-related risks as well as violations of human rights- or environment-related obligations that have arisen as a result of the economic actions of a company in its own business area or of a direct supplier (cf. section 8 (1) sentence 2 LkSG). It also aims to take transparent and effective actions against human rights and environmental risks as well as violations of due diligence obligations in one's own business sector following a notice and putting a stop to them. This includes the area of direct and indirect suppliers (cf. section 9 (1) LkSG). Furthermore, it is considered a kind of early warning system through which potential risks and breaches of duty in the above sense can be identified and resolved at an early stage before people or the environment are harmed.

3. Regulatory area

The Rules of Procedure regulate and inform about:

- the accessibility, competence and implementation of the complaints procedure,
- the internal person assigned by the SNIPES Group to carry out the complaints procedure,
- Independent, impartial action of the responsible person, and
- preserving the confidentiality of the identity of persons involved in the complaints procedure and the effective protection of whistleblowers against punishment or disadvantage on account of their complaint.

4. Scope

Submitting reports about human rights and environment-related risks and breaches of duty in one's own business area applies to persons in the direct business relationship such as one's own employees, suppliers, customers, trade unions and cooperation partners as well as external persons such as employees of third-party service providers and temporary workers. This also applies to third parties such as non-governmental organisations and media representatives.

Human rights and environmental risks and breaches of duty include in particular:

Human rights violations:

- Physical violence such as assault, sexual abuse, harassment
- Psychological violence such as discrimination, bullying, insults, blackmail

Work rules:

- Lack of employment contracts, non-payment of wages, overtime, forced labour, child labour
- Inadequate accommodation
- Lack of the right of freedom of association, lack of maternity protection

Environment, health and safety:

- Violations of environmental and health regulations
- Inadequate working conditions
- unsafe way to work

5. Accessibility

- a) The complaints procedure is available through several channels. First: it can be accessed via the following publicly accessible website:
<https://sicher-melden.de/whistle/#/mainpage/icm50493/snipes>
 The whistleblower can access this website via the SNIPES online shop, or a QR code on complaint posters posted in local factories. The complaint can be submitted in written or spoken form.
 Second: the complaints procedure can be initiated for some countries specifically via telephone hotlines, which can also be found on the complaints posters in the local factories.
- b) After submitting the report, the whistleblower receives confirmation of receipt of the complaint by e-mail within 24 hours. This mail is sent either to an anonymous mailbox on the whistleblower page or directly to the whistleblower's own mail address if provided. Via the anonymous or private mailbox, the whistleblower will also be informed about the further course of the complaints procedure.
- c) The person assigned by the SNIPES Group to carry out the complaints procedure will discuss the facts of the case with the whistleblower. If a more extensive investigation of the facts is necessary, an employee of the company or an appropriately assigned external service provider will carry out an on-site inspection.
- d) There is the possibility of initiating a procedure for a consensual settlement. Should no settlement take place, the SNIPES Group reserves the right to decide on the facts underlying the complaint in an appropriate manner, taking into account and after extensive consideration of all concrete circumstances.
- e) If the SNIPES Group has caused or contributed to the complaint through its own actions, processes will be initiated to remedy the unlawful situation or at least minimize the negative effects and avoid the risk of repetition as far as possible.

6. Responsibility

The SNIPES Group has assigned a human rights officer who is primarily responsible for monitoring risks with regard to human rights and environmental protection. The assigned person acts impartially, i.e. in particular independently and not bound by instructions, and is obliged to maintain confidentiality.

7. Protection from disadvantage or punishment

Above all, through information campaigns, awareness-raising and training measures within the supply chain, it should be made clear to every person that he or she can use the described complaints procedure to submit complaints in the sense mentioned above without having to fear of being disadvantaged or penalized. Should a disadvantage or punishment nevertheless occur, it is expressly requested to be reported in order to subsequently find an appropriate solution and, if necessary, compensation for the disadvantaged person by means of dialogue with the parties involved. The complaint procedure serves to clarify and prevent human rights and environmental violations and should not be understood as denunciation or discrediting. Therefore, it is important to the SNIPES Group to protect whistleblowers as best as possible from discrimination and punishment.

8. Data protection

The SNIPES Group treats personal data – insofar as it is voluntarily provided, stored or processed within the scope of the notification and communication via the platform - confidential and in accordance with the statutory data protection regulations - above all the European General Data Protection Regulation (GDPR) - as well as this data protection declaration.

What personal data is collected?

Only personal data that the whistleblower consciously and on his or her own responsibility provides will be collected:

- Name
- E-mail address
- Other personal data arising in the course of the description of the complaint

The target is to process the data of whistleblowers while preserving their anonymity. The complaints system collects data on the nature of general system use. This includes the number of reports on certain categories and information on the processing of reports. The complaints system does not carry out any statistical evaluations that would allow conclusions to be drawn about an individual user. The complaints system is an Internet-based alternative to the usual communication channels and/or internal company functionaries and therefore does not necessarily request personal data from the whistleblower. The whistleblower's personal data is entered into the complaints system solely on a voluntary basis by the whistleblower.

a) Storage of personal data of the whistleblower

Anonymity guarantee: User behavior is recorded anonymously by the complaints system. Voluntarily provided personal data can be viewed by whistleblowers at any time via the complaints tracking system.

Further information about the personal data stored in the complaints system (reporting platform) is technically not possible. All data entered by the complainant is stored individually in encrypted form in a database. Neither administrators, website operators nor other persons have the possibility of gaining access to the content of the personal data deposited by the whistleblower.

b) Storage of personal data of the person concerned by the complaint

In the case that personal data of a person affected by the complaint are stored, he or she shall be informed about the processing and use of these data, provided that the clarification of the facts is not endangered thereby. In this case, the person affected by the report also has a right to be informed about the personal data stored. The identity of the whistleblower is generally excluded from this right to information, subject to the above provisions.

c) Disclosure of personal data

When violations are reported, the designated department (e.g. internal audit, compliance and any group companies involved) receives the personal data - if available - for further internal processing.

In addition, the platform operator of our digital reporting system processes the personal data of the whistleblower as a SNIPES Group assigned processor (Art. 28 GDPR). This processor will implement appropriate technical and organizational measures to ensure processing in compliance with the requirements of the GDPR and the protection of the rights of the data subjects.

For its part, the operator uses the service providers bytemine GmbH and gridscale GmbH, whereby the subcontracted processors only have the possibility of becoming aware of personal data and the data is pseudonymised or even removed from any personal reference (anonymised).

Any disclosure and processing of the data in the company affected by the report, insofar as this is necessary for clarification, requires the prior consent of the whistleblower. In case of such consent, the recipient may be obliged pursuant to Art. 14 of the GDPR to also inform the party affected by the report of the identity of the whistleblower one month after becoming aware of it, at the latest, however, if this information would not endanger the clarification of the facts and/or the securing of evidence. If a whistleblower has given consent to the processing of his or her personal data, he or she may revoke this consent at any time with effect for the future pursuant to Art. 7 (3) sentence 1 GDPR.

d) Safeguarding the rights of data subjects

According to European data protection law, the whistleblower and the persons named in the notification have the right to information, correction, deletion, restriction of processing and the right to object to the processing of their personal data. According to Art. 15 GDPR, the data subject is entitled to information about the data stored about him or her. However, there is no obligation to provide information insofar as the information would disclose information which by its nature must be kept secret, in particular because of the overriding legitimate interests of a third party (cf. section 29 (1) sentence 2 German Federal Data Protection Act). If the right of objection under Art. 21 GDPR is exercised, we will immediately check the extent to which the stored data is still required, in particular for the processing of a notification. Data that is no longer required will be deleted immediately. For further questions the whistleblower can contact the data protection officer at any time at the address given in the imprint.

Furthermore, the whistleblower has the right of appeal to the competent supervisory authority (cf. Art. 77 GDPR). This is the state representative for data protection and freedom of information of North-Rhine Westphalia, Germany (in German: Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, LDI NRW).

e) Deletion & Modification

Persons affected (in particular the whistleblower) have the right to have incorrect data corrected, modified, blocked or deleted if the legal requirements are met. The statutory deletion and storage periods apply. If whistleblowers have submitted personal data, it will be retained for as long as is necessary to clarify and conclusively assess the reported facts. After the conclusion of the complaints procedure, this data will be deleted in accordance with the legal requirements. To maintain the integrity of the data, automatic backups are regularly performed by the application and the database. The storage period of a backup is a maximum of one calendar month. Older backups and all corresponding copies are automatically deleted.

f) SSL or TLS encryption

For security reasons and to protect the transmission of confidential content, which is sent to the SNIPES Group by the whistleblower, this site uses SSL or TLS encryption. The whistleblower can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in the browser line. If SSL or TLS encryption is activated, the data transmitted to the SNIPES Group cannot be read by third parties.

g) Data Protection Officer

The legally prescribed data protection officer at SNIPES is:

Martin Hölscher (in-house lawyer)
Deichmann SE
Deichmannweg 9
Essen 45359
dsb@deichmann.com

9. Effectiveness of the complaints procedure

The effectiveness of the complaints procedure is reviewed at least once a year and on an ad hoc basis. The effectiveness of the complaints procedure will be reviewed on an ad hoc basis if the SNIPES Group must expect a significantly changed or expanded risk situation in its own business division or at the direct supplier. This may be due to the introduction of new products, projects or a new business field. The measures are repeated immediately if necessary. For the annual review of effectiveness, the complaints received during the year are quantified, thematically sorted and analysed. In addition, the time taken to process the complaint and the number of complaints processed are compiled. After completion of the complaints procedure, the whistleblower is free to rate his or her experiences, especially in connection with technical handling and results of the complaints procedure, in a survey. In this way, the continuous technical development of the complaints system is ensured.