

Complaints procedure pursuant to the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

Last update: December 2023

Aareal Bank AG has set up a complaints procedure for reporting human rights risks and environmental risks or violations in Aareal Bank's supply chain, as required by the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG). This procedural guideline provides information about how to report a complaint.

Who can submit complaints?

Any natural or legal person who suspects human rights risks or environmental risks, or breaches of duty in the area of human rights or environmental protection, resulting from the Bank's economic activity in either its own business operations or those of its direct or indirect suppliers is entitled to draw attention to this fact. In addition to subsidiaries and locations in Germany¹⁾, our own business operations comprise Aareal Bank Asia Ltd., Singapore, and Aareal Capital Corporation, USA, and our foreign locations.

What concerns can be reported?

The scope of application of the LkSG includes human rights and environmental concerns relating to our supply chain, especially in the following areas:

- child labour;
- forced labour;
- slavery, practices akin to slavery, or other forms of domination or oppression in the workplace environment;
- disregard for the occupational safety and health obligations applicable under the law of the place of employment;
- disregard for freedom of association;
- unequal treatment in employment;
- withholding of an adequate living wage;
- causing any harmful change to the soil; water or atmospheric pollution; harmful noise emissions or excessive water consumption;
- unlawful eviction and the unlawful taking of land, forests and waters;
- environmental risks such as the use of mercury in manufacturing processes where this is prohibited by law and
- the environmentally unsound handling of (hazardous) waste.

A comprehensive list of the risks covered by the LkSG is given in section 2 (2) and (3) of the LkSG.

How can complaints be submitted?

Complaints falling within the scope of the LkSG and questions relating to the complaints procedure can be submitted at any time using one of the following channels:

- our SpeakUp whistleblowing system (worldwide free of charge): <https://aarealbank.speakup.report/AarealBankExternal>



¹⁾ Aareon AG has its own complaints procedure.

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- free of charge by phone on **0800 181 89 52** within Germany (voice mailbox). Outside Germany, we also provide local reporting channel numbers (calls may be charged at local rate) in the countries of our foreign locations (https://www.aareal-bank.com/fileadmin/07_Specials/local_reporting_channel_number.pdf). When you dial a phone number, your voice recording will be transcribed (i. e., the spoken word is converted into written text) and saved.

Please also state our **organisation code (110024)** when submitting a complaint.

Both of these channels can be used to submit complaints anonymously. The languages used in the procedure are generally German and English. However, complaints can also be submitted in other languages, in which case communications will be translated.

What information is needed to submit a complaint?

There are no minimum requirements that have to be satisfied before a complaint can be submitted. Equally, you do not have to reveal your identity. However, we request that you provide the following information, if possible, when submitting your complaint in order to enable it to be processed swiftly:

- the legal rights that you think have been breached or endangered;
- whether your suspicions relate to activity by our company or by a supplier and, in the case of a supplier, the supplier concerned;
- as detailed a description of the facts of the case as possible, including in particular information about its timing and location;
- your contact details, unless you want to submit your complaint anonymously.

What happens once a complaint has been submitted?

In a first step, the internally entrusted complaints handling function (Aareal Bank's human rights officers) establishes whether the complaint falls within the scope of the LkSG.

Where contact information has been provided, the whistleblower (or in case of representation with power of representation or powers of attorney, the representative) will be informed in a timely manner, and at the latest within seven Bank working days, of the receipt of the complaint. At the same time, the whistleblowers will be offered an exploratory discussion in a form to be agreed with them.

After this, the competent function (Aareal Bank's human rights officers) will examine in greater detail the LkSG-related facts of the case that have been reported. Everyone involved in processing the complaint is impartial, is not required to follow instructions, and is bound by a duty of confidentiality. The identities of both the whistleblower and other people mentioned in the complaint are treated in strict confidence.

Information is only passed on to other functions or bodies (internal or external) if this is necessary for determining the facts of the case or to take preventive or corrective measures ("need-to-know basis"). The identities of the whistleblower and of other people affected are only passed on if their consent to this has been obtained or if we are required by law to do so.

Information on how personal data are processed during the complaints procedure can be found in our data privacy statement <https://www.aareal-bank.com/en/footermenu/data-protection/>.

Where the whistleblower has supplied contact information, he or she will receive information on the status of and estimated time frame for the investigation within three months. If the complaints procedure takes longer, the whistleblower will receive quarterly status updates.

If a breach of human rights or environmental requirements must be considered to exist or to be imminent, suitable preventive and corrective measures will be taken. The whistleblower will be informed of this if possible. The whistleblower will also be informed if Aareal Bank decides to discontinue the investigation, and will be told the reason for this.

Please note that the complaints procedure and in particular any exploratory discussion do not suspend any statutes of limitation.

What are the consequences of submitting a complaint?

Aareal Bank does not tolerate any discrimination against, or punishment of, whistleblowers because of the complaints they have submitted. It takes the protective measures described in these rules of procedure, in particular, it treats complaints submitted as confidential. Discrimination includes but is not limited to actions such as disciplinary measures, demotions or terminations due to the complaint submitted.

Please contact us if you believe you have been discriminated against or punished because you have submitted an LkSG complaint.

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