

# Rules of Procedure for the Complaints Procedure under the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains for the G+D Group

The Giesecke+Devrient Group (G+D) undertakes to always act in accordance with all legal requirements, including human rights and environmental due diligence obligations under the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (LkSG).

Whistleblowers make an important contribution to the detection of grievances. To this end, G+D has set up a complaints procedure through which notices can be provided on (potential) violations of requirements subject to penalties and fines (including human rights and environmental due diligence obligations under the LkSG) as well as internal regulations.

The following summarizes the most important information:

## 1. Who can submit notices and complaints?

The G+D complaints procedure is accessible to everyone, both G+D employees and external persons and organisations (e.g. employees of suppliers or other affected persons).

## 2. What notices and complaints can be submitted?

All employees and external persons can submit notices and complaints about (potential) violations of requirements subject to penalties and fines as well as internal regulations. This also includes notices on human rights or environmental risks or violations arising from G+D's economic activities in its own business area or a supplier of G+D.

## 3. How can notices and complaints be submitted?

All employees and external persons can submit notices and complaints in the following ways:

- in writing or verbally, also anonymously, free of charge and available 24/7 via the electronic G+D whistleblowing tool "G+D Integrity Line": <https://gd.integrityline.app/>
- by post or by e-mail to the Corporate Compliance Office of G+D GmbH at the following address:

Giesecke+Devrient GmbH  
Corporate Legal, Compliance & Data Privacy  
Prinzregentenstr. 161  
81677 Munich  
Germany

e-Mail: [whistleblowing@gi-de.com](mailto:whistleblowing@gi-de.com)

- In person at the Corporate Compliance Office of G+D GmbH by prior appointment via: [whistleblowing@gi-de.com](mailto:whistleblowing@gi-de.com)

Accountable: Martina Seidl	QM: Frank Krüger	Page 1 of 2	ID: IM3/10000592803/EN	Version: 03	Date: 17.02.2025
Author: Tobias Konstantin Kruis	© G+D 2025. <b>PUBLIC.</b> Disclosure to customers or third parties only with approval of the respective quality manager. This printed version will not be updated.				

G+D employees can also contact their superiors or the responsible Local Compliance Officers or Compliance Offices by telephone, e-mail or in person.

## 4. What happens to submitted notices and complaints?

- a. Incoming reports are documented and the whistleblower receives confirmation of receipt within seven days (in the case of anonymous notices, if possible).
- b. The contacted reporting office checks whether it is responsible for the report received. If necessary, it will refer the procedure to the competent reporting office in the company for further investigations, while respecting the principle of confidentiality and data protection.
- c. The competent reporting office checks whether all the necessary information for the further processing of the facts is available and, if necessary, will contact the whistleblower to discuss the facts and ask questions.
- d. The competent reporting office will investigate the facts comprehensively on the basis of the available information and, if necessary (and as far as possible in the case of anonymous reports), discuss the facts with the whistleblower. If, after examining the individual case by the competent reporting office, there is no violation of requirements subject to penalties or fines (e.g. human rights or environmental due diligence obligations according to the LkSG in its own business area or at a supplier) or internal regulations, the case will be closed.
- e. If, after examining the individual case by the competent reporting office, there is a (potential) violation of requirements subject to penalties and fines (e.g. human rights or environmental due diligence obligations under the LkSG in its own business area or at a supplier) or internal regulations, a proposal for further action is drawn up, which contains in particular prevention and remedial measures. As far as possible and reasonable, the whistleblower and his expectations are included. The implementation of the proposed solution is monitored by the competent reporting office and the effectiveness of the proposed solution is checked. Provided that it is possible to make contact and that this does not endanger internal investigations and data protection requirements, the whistleblower will be informed of the conclusion of the proceedings.

## 5. How are whistleblowers protected?

All information that is part of a notice or complaint will be treated confidentially in accordance with legal requirements. Legal obligations to provide information to authorities as well as legal exceptions to the confidentiality requirement must be observed.

The competent reporting office shall have the necessary expertise and shall act independently and impartially in the performance of their tasks. They undertake to maintain secrecy as well as to comply with data protection regulations and transparency. The protection of the rights of whistleblowers is ensured.

In order to prevent reports from being omitted because whistleblower fear reprisals, the upright whistleblower is protected against reprisals in accordance with the statutory provisions.

Whistleblowers who feel that they are suffering intimidation or retaliation as a result of their report may also contact the hotline.

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