

## **Mediahuis Aachen GmbH**

Complaints procedure in accordance with the Supply Chain Due Diligence Act (LkSG)

### **-Order of Procedure-**

for the companies of the Mediahuis Aachen Group (MHA)

valid from 01.08.2024

## **I. Overview / area of application**

To implement the requirements of the Supply Chain Due Diligence Act, the MHA Group operates a whistleblower system as part of a complaints procedure (Section 8 LkSG).

The complaints hotline therefore makes it possible to

- employees of the MHA Group,
- business partners and
- Third parties

Information and complaints - anonymously if desired - regarding

- human rights and environmental risks, and
- Violations of human rights or environmental obligations

in the business area of the MHA Group or a direct or indirect supplier (supply chain).

## **II. Available complaint channels and contact persons**

The above-mentioned groups of people can contact the responsible office of the MHA Group via the following two complaint channels.

1. Telephone hotline: +49 (0) 241 / 5101-117  
(Mon.-Fri. 10:00 to 17:00; excluding public holidays)
2. e-mail: [compliance@aachener-zeitung.de](mailto:compliance@aachener-zeitung.de)

### III. Procedure of the complaints procedure

1. Receipt of the complaint or notification by the responsible office of the MHA Group	2. Examination of the complaint or tip-off	3. Reporting	4. Further clarification of the facts /Development of a solution	5. Implementation of solutions and remedial measures	6. Review and finalisation
<p>Telephone hotline:</p> <p>a. Facts are recorded b. Information is scrutinised c. Open questions are clarified d. Notification of a project number to the whistleblower</p> <p>e-mail:</p> <p>a. Whistleblower receives a confirmation of receipt b. Notification of a project number to the whistleblower</p>	<p>The complaint or tip-off is assessed by the competent body. The competent body draws up initial recommendations for action.</p>	<p>The responsible body receives a report.</p>	<p>If necessary, the reported facts will be investigated by MHA in dialogue with the whistleblower. MHA develops solutions / remedial measures (if necessary in dialogue with the whistleblower).</p>	<p>The solutions and remedial measures are implemented.</p>	<p>The result achieved / the solution found is discussed with the whistleblower .</p>

### IV. Whistleblower protection - "Non Retaliation"

Whistleblowers do not have to fear any disadvantages from the MHA Group as a result of using the hotline - whether by telephone or e-mail.

The MHA Group expressly undertakes not to take any reprisals or retaliatory measures ("non-retaliation policy").

However, the right to protection does not exist if the subject of the notification is deliberately and knowingly false or misleading information or if the notification has otherwise been made improperly.

### V. Effectiveness control

The complaints procedure is subject to an effectiveness review at least once a year and can be revised if necessary. In addition, findings from the regular risk analysis are included.