

Rules of procedure for the complaints procedure in accordance with Section 8, LkSG (German Supply Chain Due Diligence Act)

As the operator of Berlin Brandenburg Airport Willy Brandt (BER), Flughafen Berlin Brandenburg GmbH and the companies affiliated with it in accordance with Sections 15 et seq., AktG (German Company Law), ("FBB Group"), we are aware of their responsibility for people and the environment. The FBB Group has put in place various measures to honour its due diligence obligations in accordance with the German Supply Chain Due Diligence Act (LkSG). The complaints procedure, which serves as an early warning system to render human rights and environmental risks visible, is a key element of risk management.

1. Purpose of the complaints procedure

The FBB Group has put in place an internal complaints procedure to fulfil its own responsibility (Section 8(1), Sentence 1, LkSG). It enables persons to draw attention to human rights and environmental risks as well as potential violations of human rights or environmental obligations that have arisen as a result of the economic activities of the FBB Group in its own business area or in the business area of one of its direct suppliers. To that end, the FBB Group makes available a Reporting Channel as part of its general electronic whistleblower system.

2. Furnishing information

Both employees and external persons can use the Reporting Channel of the complaints procedure to report any human rights and environmental risks and breaches of duty. The Reporting Channel can be accessed via the following link [1]. Reports can also be submitted anonymously. The identity and anonymity of the whistleblower are protected via the technical devices of the whistleblower system.

The Reporting Channel can be accessed via the whistleblower system on the FBB Group website and intranet. Reports can be submitted in German and English at any time.

Further to this Reporting Channel information can also be furnished directly to the Legal and Compliance organisational unit by e-mail (lieferkettencompliance@berlin-airport.de). The FBB Group's ombudsman's office [2] is also available as a point of contact for whistleblowers.

3. Responsibility for the complaints procedure

Employees who deal with the complaints procedure in accordance with Section 8, LkSG ("Complaints officers") are responsible for processing incoming information. They have the necessary technical expertise and receive appropriate training. As Complaints Officers they are independent, under obligation to maintain secrecy and are not bound by instructions in their work. They discuss the facts of the matter with the whistleblowers, receive information and document it in compliance with the confidentiality requirement. Where possible, the Complaints Officers enter into dialogue with the whistleblowers.

4. *Protection of whistleblowers*

Whistleblowers are not placed at a disadvantage in any way by the companies of the FBB Group, its employees or board members. The FBB Group does not tolerate any retaliation based on whistleblowing. Violations of the prohibition of discrimination shall be penalised by way of disciplinary action.

The identity of the whistleblower must be kept absolutely confidential as part of the complaints procedure. If the whistleblower has disclosed their identity, this may not be disclosed to any other person by the Complaints Officers without their express consent.

5. *Course of the procedure*

Receipt of the whistleblower report in the Reporting Channel is usually confirmed within 72 hours, at the latest within seven days.

Once the report has been received, it is reviewed in respect of plausibility and a decision is taken about the necessary measures. In the event of actual indications of human rights or environmental risks or violations of human rights or environmental obligations, the Complaints Officers shall clarify the facts. They adopt the necessary measures and document the process and the result appropriately. The internal investigation is conducted with the involvement of the necessary departments on a strictly need-to-know basis. Indications of violations at direct suppliers are investigated with them. Each investigation is finalised by way of a written final report, which is strictly confidential.

The whistleblower receives feedback about the current status within three months of confirmation of receipt and following completion of the procedure. Feedback is only omitted in exceptional cases if this would jeopardise clarifying the facts or the rights of the persons affected by the report or stated in it.

The documentation shall be kept for two years following completion of the procedure and then deleted and, if necessary, destroyed, unless deletion is in conflict with statutory provisions.

No.	Hyperlink	Link/plain text
[1]	Whistleblower System	www.bkms-system.net/fbb
[2]	Ombudsman's Office	ombudsperson-fbb@fs-pp.de