

The German Supply Chain Act

Regulations for reporting grievances in line with the German Supply Chain Act (“LkSG”)

Under Section 8 of the German Supply Chain Act (“LkSG”) BayernLB is required to install a mechanism for reporting grievances pertaining to human rights violations or environmental destruction, or to the risk of a human rights violation or environmental destruction, arising from its own scope of business or the business activities of a direct supplier.

BayernLB’s scope of business extends to the following affiliated companies:

- Bayerische Landesbank Immobilien-Beteiligungs-Gesellschaft mbH & Co. KG
- Bayerische Landesbank Immobilien-Beteiligungs-Verwaltungsgesellschaft mbH
- Bayern Facility Management GmbH
- BayernInvest Kapitalverwaltungsgesellschaft mbH
- BayernInvest Luxembourg S.A.
- LB Immobilienbewertungsgesellschaft mbH
- Berchtesgaden International Resort Betriebs GmbH
- Real I.S. AG Gesellschaft für Immobilien Assetmanagement
- BayernLB Capital Partner GmbH
- BLB-Beteiligungsgesellschaft Sigma mbH
- Bayern Bankett Gastronomie GmbH
- German Centre for Industry and Trade Shanghai Ltd.
- German Centre for Industry and Trade Taicang Co. Ltd.

This Act applies furthermore to Bayerische Landesbodenkreditanstalt and to BayernLB’s foreign branches.

Under what circumstances can I report a grievance?

You may report any grievance involving a human rights violation or an act of environmental destruction, or a risk of a human rights violation or environmental destruction (see Section 2 paras. 2 to 4 of the LkSG), arising from BayernLB’s own scope of business or from the business activities of a direct or indirect supplier of BayernLB.

Who can report a grievance?

Any person who is directly affected can report a grievance, whether they are an employee of BayernLB or someone external to the Bank. But even someone who is not directly affected by the situation may file a report about a risk or potential violation of the due diligence obligations. The report may also be filed on behalf of people who are directly affected.

To whom can I address a grievance?

Please address any grievances by post or e-mail to the BayernLB Complaint Management unit under:

hinweis@bayernlb.de

or

Bayerische Landesbank
Anti-Financial Crime & Sanction Monitoring Department
Brienner Strasse 18
80333 Munich, Germany

Or call us at +49 89 2171-28844.

No fees will be charged to you whatsoever in connection with your submission of the report or our processing of it.

What information do you need from me?

In order for us to be able to follow up on your report, we will need as many details as possible about the situation or subject of your report. This includes:

- Your complete contact information (postal address, telephone number and e-mail address (optional))
- The name and address of the (affiliated) company or supplier in question
- A detailed description of the situation, and why you are reporting the grievance
- Any supporting documents or other material
- The human rights or environmental risk involved (see Section 2 paras. 2 to 4 of the LkSG)
- If reporting the grievance on someone else's behalf: a statement by that person authorising you to do so

What happens once my report is submitted?

Once the BayernLB Complaint Management unit receives your report, you will receive confirmation of the receipt, along with any questions we may have should we need further information or supporting documents. If you have reported the grievance to us by telephone, we will send you a document and ask that you confirm that we have understood everything correctly. We will also let you know as soon as possible about our next steps and the timetable for processing your report.

Should we need more time than expected to process your report, we will notify you of this fact and the reasons for the delay, and we will state when we expect to issue a response.

You will receive our response to your report within a reasonable period. The processing time depends heavily on the complexity of the grievance. We unfortunately cannot rule out the possibility of not being able to find a

solution that is acceptable to you. In such cases, you will receive a detailed explanation from us as to why this is so.

Who in fact processes my report?

Your report will be processed by Complaint Management, a special unit set up at the Anti-Financial Crime & Sanction Monitoring Department explicitly for this purpose. This unit, which is with the Compliance Division, is required to act without bias and is autonomous. Employees entrusted with the duties carried out by this unit are required to maintain confidentiality. The Complaint Management unit will enlist the aid of other sources if necessary for addressing your grievance, in which case you will become anonymous as the person who has filed the grievance report. In the event that the circumstances surrounding the grievance do not allow for such anonymisation beyond the Complaint Management unit, we will notify you of this explicitly so as to seek a solution that is acceptable to you.

What does BayernLB do to protect me, as a whistleblower, from being discriminated against or penalised?

The LkSG requires that an organisation's procedure for reporting grievances protect the person filing the report effectively from discriminatory or penalising responses to their reporting. BayernLB takes this requirement very seriously and takes measures, aligned specifically with the situation reported by you, to protect you from being discriminated against or penalised. One example of a protective measure is the above-mentioned anonymisation of your report when enlisting the aid of other sources at BayernLB or a BayernLB supplier.

Whom to contact

Bayerische Landesbank
Briener Strasse 18
80333 Munich
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Anti-Financial Crime & Sanction Monitoring Department
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