

Rules of Procedure for complaints in line with the German Supply Chain Act

Rules of Procedure for complaints in line with the German Supply Chain Act (“LkSG”)

Under Section 8 of the German Supply Chain Act (“LkSG”) BayernLB is required to install an appropriate internal complaints procedure which enables persons to report human rights and environment-related risks as well as violations of human rights-related or environment-related obligations that have arisen as a result of the economic actions of an enterprise in its own business area or of a direct supplier.

BayernLB’s area of business extends to the following affiliated enterprises:

- Bayerische Landesbank Immobilien-Beteiligungs-Gesellschaft mbH & Co. KG
- Bayerische Landesbank Immobilien-Beteiligungs-Verwaltungsgesellschaft mbH
- Bayern Facility Management GmbH
- Bayern Corporate Services 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.

The Rules of Procedure apply furthermore to Bayerische Landesbodenkreditanstalt and to BayernLB’s foreign branches.

Under what circumstances can I file a complaint?

You may report any human rights and environment-related risks as well as violations of human rights-related or environment-related obligations (see Section 2 paras. 2 to 4 of the LkSG) that have arisen as a result of the economic actions of BayernLB’s own area of business or from the business activities of a direct or indirect supplier of BayernLB .

Who can file a complaint?

Any person who is directly affected can file a complaint, 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 complaint

about a risk or potential violation of the due diligence obligations. The complaint may also be filed on behalf of people who are directly affected.

To whom can I address a complaint?

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

hinweis@bayernlb.de

or

Bayerische Landesbank
Anti-Financial Crime & Sanction Monitoring Department - Hinweisgeberstelle
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 complaint or our processing of it.

What information do you need from me?

In order for us to be able to follow up on your complaint, we will need as many details as possible about the situation or subject of your complaint. 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 environment-related 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 complaint is submitted?

Once the BayernLB Complaint Management unit receives your complaint, 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 filed the complaint 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 complaint.

Should we need more time than expected to process your complaint, 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 complaint 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 complaint?

Your complaint 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 complaint, in which case you will become anonymous as the person who has filed the complaint. 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 complaints procedure protects the person filing the complaint effectively against disadvantage or punishment as a result of a complaint. 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 complaint when enlisting the aid of other sources at BayernLB or a BayernLB supplier.

Whom to contact

Bayerische Landesbank
Briener Strasse 18
80333 Munich
Germany

Anti-Financial Crime & Sanction Monitoring Department - Hinweisgeberstelle
Tel. +49 89 2171-28844