

Procedural rules for the complaint procedure under the Supply Chain Due Diligence Act (LkSG)

Berlin, 1. January 2024

[The following are used as synonyms: CMS/we; information/notification/complaint; informant/person filing a complaint/you, etc.]

CMS Hasche Sigle Partnerschaft von Rechtsanwälten und Steuerberatern mbB (CMS) strives to prevent and minimise human rights risks and environmental risks internally and in its supply chains, and to end or minimise violations of human rights or environmental obligations. By providing us with information regarding such risks or violations, you can help CMS become aware of issues and find a solution.

You can provide us with information in several ways. You can:

- write and send a message [here](#) at the bottom
- email us at compliance-officer@cms-hs.com
- mail a letter to: CMS Hasche Sigle Partnerschaft von Rechtsanwälten und Steuerberatern mbB – Compliance Office, Lennéstraße 7, 10785 Berlin – or
- call us at +49 30 203 60 2580. You can reach us at that number during our business hours from Monday through Friday from 9:00 a.m. to 6:00 p.m. Optionally, you can also leave a message on the mailbox at that number outside of those business hours.

Please note the following information **before** notifying us:

1. What complaints can you report via the notification system?

You can use this notification system for information on

- human rights and environmental risks as well as
- violations of human rights-related or environmental obligations within the meaning of the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG), if these risks or breaches have arisen from the economic actions of CMS itself or a CMS supplier.

In addition, information about the following circumstances can also be provided:

- irregularities in business transactions (corruption and other economic crimes, anti-competitive violations)
- conflicts of interest in the mandate
- money laundering
- harassment and discrimination
- employee rights and protection
- data protection violations
- violations of professional law and professional standards
- violations of our internal policies

2. Who may use the notification system?

Anyone who learns of any of the risks or violations described above (number 1) can file a complaint. This also applies to associations, such as non-governmental organisations. The person submitting a complaint does not have to be affected personally.

3. What should you share in a complaint?

Complaints should be based on facts and contain as many relevant facts as possible, provided that the person filing the complaint has this information. You should also mention the objective you are pursuing with the complaint.

4. Who is responsible for handling the complaint?

The CMS Compliance Team is responsible for handling complaints. Notifications that fall within the area of expertise of other departments (e.g. ESG, HR, or Accounting) are forwarded internally to the appropriate departments, and the confidentiality of the notifications is always maintained. In this respect, the handlers are not bound by instructions and are obliged to maintain secrecy.

5. What protection does the notification system offer the person filing the complaint?

Persons filing a complaint who provide information to the best of their knowledge and belief and who, in particular, do not intentionally make untrue assertions are protected against negative consequences or punishment due to the complaint. Your identity will be treated confidentially. You can also give us the information without providing your name.

6. How does the complaint procedure work?

If information is received via the notification system, this is immediately confirmed to the person or organisation filing the complaint. It is then verified whether it is a relevant complaint (see number 1 above). If necessary, the facts will be further clarified through discussion with the person filing the complaint, among other things. If the facts are sufficiently clarified, the person filing the complaint will receive at least one statement of the state of affairs. As soon as it is established whether the complaint is justified, the person filing the complaint will also be informed of this. If the complaint proves to be justified, we will immediately take the necessary measures – in consultation with the supplier concerned or the responsible department, if necessary – to prevent, end, or minimise the risk or violation in question. The actions suitable and appropriate to achieve this goal depend on the individual case.



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