

## **Rules of procedure for the complaints procedure pursuant to Section 8 of the Supply Chain Due Diligence Act (LkSG)**

### **of Loyalty Partner GmbH, Loyalty Partner Solutions GmbH and PAYBACK GmbH**

The companies Loyalty Partner GmbH, Loyalty Partner Solutions GmbH and PAYBACK GmbH (hereinafter referred to as the PAYBACK GROUP) are aware of their social and ecological responsibility within their own company and the entire supply chain.

It is important to us that basic human rights and environmental standards are observed.

In order to fulfill the corporate due diligence obligations of the LkSG, we have set up the following complaints procedure, which can be used to report human rights and environmental risks or violations of human rights or environmental obligations can be reported:

#### **1. Types of complaints**

Any person, regardless of whether he/she is an employee of the PAYBACK GROUP or an external person (hereinafter referred to as the "complainant"), may submit a complaint relating to a possible PAYBACK GROUP's own business area or in the PAYBACK GROUP's supply chain. human rights and environmental risks as well as violations of human rights or environmental obligations.

#### **2. Complaint channels**

An internet-based complaints channel has been set up for these complaints. This can be accessed in several languages via the following link

**<https://secure.ethicspoint.com/domain/media/de/gui/49467/index.html>**

Our appropriately trained human rights officer will handle incoming complaints with the utmost confidentiality and care. diligence. The human rights officer acts impartially in his function, independent and not bound by instructions.

#### **3. Data protection and confidentiality/protection of the complainant**

The complaints procedure ensures through the personnel, organizational and technical design the confidentiality of the identity of complainants and the protection of their personal data at all times, insofar as personal data at all times, insofar as this does not conflict with statutory or official disclosure and reporting obligations do not conflict with this.

The persons entrusted with the processing of complaints are obliged to maintain confidentiality and to compliance with data protection regulations.

#### **4. Course of the complaints procedure**

- Upon receipt of the complaint, the complainant will receive an email confirming receipt of the complaint, as well as information on the next steps, the specific timeline for the procedure and an explanation of the complainant's rights with regard to protection from discrimination or punishment.
- It is checked whether the facts reported in the complaint actually constitute a human rights or environmental risk or a violation of human rights or environmental obligations. If neither human rights or environmental risks nor the violation of human rights or environmental obligations are the subject of the complaint, the complainant receives a notification stating the reasons for rejecting the complaint. If the complaint falls within the scope of the complaints procedure, the Human Rights Officer will take up the clarification of the facts; if necessary, the complainant will be involved for further discussion. If the necessary information on the facts of the case is missing and the complainant cannot be contacted, the case will be closed.
- If further examination of the facts reveals that there is a possibility of human rights or environmental risks human rights or environmental risks exist or that the violation of human rights or environmental human rights or environmental obligations has already occurred, remedial measures are initiated immediately and their implementation is followed up.
- Once the remedial measures have been implemented, they are regularly checked for their effectiveness.
- The complainant is informed of the conclusion of the procedure, provided that a contact possibility exists.
- The processing time is highly case-dependent and can therefore range from a few days to several months. However, the PAYBACK Group endeavors to conduct a prompt investigation.

## **5. Documentation**

The entire complaints procedure for each individual case is documented and the documentation is kept for a period of seven years.

As at: 12/31/2023