BayernLB

Financing progress.

Rules of Procedure GSCA Complaints

Finanzgruppe

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

Under Section 8 of the German Supply Chain Act ("GSCA") 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
- 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
- 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. The Rules of Procedure have been in effect since January 2023.

Under what circumstances can I file a complaint?

You may report any human rights and environment-related risks as well as violations of hu-man rights-related or environment-related obligations (see Section 2(2)4 of the GSCA) 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. This also includes reports on risks and potential violations in connection with the extraction, trade, processing and export of raw materials (e.g. gold) from conflict-affected and high-risk areas (CAHRAs – Conflict-Affected and High-Risk Areas).

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 internet to the BayernLB Complaint Management unit under:

BayernLB Integrity Line

or

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

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:

- 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(2)4 of the GSCA)
- If reporting the grievance on someone else's behalf: a statement by that person authorising you to do so
- What expectations you have regarding possible preventive measures or remedial action

What happens once my complaint is submitted?

Once the BayernLB Complaint Management unit receives your complaint, you will receive confirmation of the receipt (within seven days), possibly along with questions (with regard to a common discussion) 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.

After no more than three months, you receive feedback on the measures planned or already taken and the reasons for them.

Should we need more time than expected to process your complaint, we will notify you of this fact and the reasons for the delay after no more than three months, 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. Unfortunately, we 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 the latter is the case.

Who processes my complaint?

Your complaint will be processed by Complaint Management, a special unit set up within the Anti-Financial Crime & Sanction Monitoring Department explicitly for this purpose. This unit, which is part of the Compliance Division, is required to act without bias and acts autonomously. 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.

Your Contact

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