



AHS-Group

Rules of procedure for the complaints procedure under the Supply Chain Due Diligence Act

The Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (LkSG) came into force on 1 January 2023. In order to improve the protection of human rights and the environment in companies' own business operations and along the corporate supply chain, the Act imposes a number of due diligence obligations on the companies concerned.

This also includes the establishment of an appropriate internal complaints procedure through which both internal and external persons can draw attention to human rights and environmental risks and the violation of human rights and environmental obligations that have arisen in the company's own business area or that of a supplier.

This document sets out the rules of procedure of AHS Aviation Handling Services GmbH and its subsidiaries (hereinafter "AHS") for the complaints procedure under the LkSG. It provides information about the main features of the complaints procedure and how to access and contact it, as well as about the complaints procedure itself.

Circle of persons providing information

The complaints procedure can be used by anyone, including persons outside the company.

The use of the complaints procedure is not associated with any costs for the whistleblower.

Reportable risks and injuries

The complaint can be used to draw AHS's attention to human rights and environmental risks and to violations of human rights or environmental obligations

- in its own business area,
- in the business area of direct suppliers,
- in the business area of indirect suppliers.

The relevant human rights and environmental risks include, among others:

- All forms of slavery;
- Child and forced labour and other economic exploitation;
- Violation of health and safety regulations;
- Discrimination and unequal treatment;
- Violation of minimum wage regulations;
- Improper storage and disposal of hazardous waste.

This list is not exhaustive. In case of doubt, we recommend that you submit the complaint and leave it to AHS to assess whether the reported risk or violation is a case of application of the complaints procedure.



Reporting channel for a notification under the LkSG

Complaints can be submitted by post, e-mail or telephone using the following contact details (hereinafter "Notification Officer"):

AHS Aviation Handling Services GmbH
Eric Weijers
Airport Plaza, Haus D, Ebene 4
Telefon: 040 5075 3839
humanrights@ahs-aero.de

Procedure of the complaints procedure

1. Confirmation of receipt

The whistleblower will receive confirmation from the Notification Officer that the report has been received.

2. Forwarding to the complaints officer

The Notification Officer will immediately forward the complaint to the internal complaints officer of AHS.

3. Checking the complaint

The complaints officer first checks whether the complaint falls within the scope of the complaints procedure. If this is not the case, he shall discontinue the procedure and inform the person making the complaint of this with a brief explanation.

If the complaint falls within the scope of the complaints procedure, the complaints officer will check whether sufficient information is available to examine and investigate the reported facts.

If this is not the case, the complaints officer will, if possible, contact the whistleblower to request further information.

If no sufficient information is available and if it is not possible to make contact, the proceedings will be discontinued.

4. Investigation of the facts

The complaints officer shall investigate the matter comprehensively himself or herself or forward it to the responsible office of AHS for investigation, while observing the principle of confidentiality and data protection.

The complaints officer or the responsible office of AHS will discuss the matter with the person making the complaint and, if necessary, request further information.

If, after clarification of the facts, discussion and investigation, the complaints officer or the responsible office of AHS is convinced that there are no human rights or environmental risks or violations of human rights or environmental obligations in its own business area or that of a supplier, the proceedings will be discontinued.

If, following an investigation, the complaints officer or the responsible office of AHS is convinced that such risks or violations exist, a proposal for further action will be drawn up. The proposal shall include, in particular, preventive and remedial measures. The whistleblower may be involved where possible and appropriate.



5. Conclusion of the procedure

The procedure ends with the development of a proposal for further action or with its discontinuation.

The whistleblower will be informed of the conclusion and outcome of the complaints procedure, provided there is an opportunity to contact him or her.

The time it takes to process a report is highly dependent on the individual case. However, AHS will endeavour to complete the investigation promptly.

6. Implementation and follow-up

The complaints officer or the responsible office at AHS will follow up on the implementation of the proposed solution.

General principles for dealing with a complaint

All information will be treated confidentially. The confidentiality of the identity of the person providing the information and of the other persons named in the information shall be maintained throughout the entire procedure, insofar as this does not conflict with statutory or official disclosure and reporting obligations.

The complaints officer and any other persons involved in the procedure are impartial, independent and not bound by instructions. They are obliged to maintain confidentiality and may only disclose details of the procedure - in anonymised form - to the extent that this is necessary to clarify the facts of the case or to develop or implement proposed solutions.

Furthermore, all data protection regulations are complied with and the rights of all data subjects are guaranteed.

Protection of the whistleblower

AHS will not tolerate any retaliation against whistleblowers for using the complaints procedure to report actual or suspected misconduct made in good faith.

If a whistleblower has the impression that they are suffering discrimination or similar because of their whistleblowing, they can contact the complaints officer. Such incidents will be investigated in accordance with the procedure described above.

Effectiveness of the complaints procedure

The effectiveness of this procedure is reviewed at least once a year and on an ad hoc basis. If necessary, adjustments are made to the procedure or corrective measures are taken.

AHS Aviation Handling Services GmbH

Date: 01.01.2024