

Rules of procedure for the complaints procedure under the German Supply Chain Due Diligence Act (LkSG)

I. Introduction

According to the Supply Chain Due Diligence Act (LkSG), companies are obliged to observe human rights and environmental due diligence obligations in an appropriate manner in their supply chains. The aim is to prevent or minimize human rights or environmental risks or to end the violation of human rights or environmental obligations.

Respecting and upholding human rights is a priority for Zurich. As part of our business activities, we are fully committed to our human rights responsibilities.

The complaints procedure enables those directly affected and those with knowledge of potential or actual violations to alert Zurich about potential risks or violations.

II. The complaints procedure

1. Which areas can be the subject of a complaint? - Scope of application

The rules of procedure for the complaints procedure under the LkSG govern Zurich's process in cases of suspected or actually human rights or environmental risks violations.

Subject of a complaint under the LkSG can be human rights and environmental risks or violations that have arisen as a result of Zurich's business activities in its own business area or those of a supplier. This includes violations of human rights or environmental obligations, such as

- Child labor
- Forced labor, slavery
- Disregard for health and safety in the workplace
- Disregard for freedom of association & expression, right to collective bargaining
- Unequal treatment in employment
- Withholding of appropriate wages
- Destruction of natural resources through environmental pollution
- Unlawful violation of land rights
- Use of security forces without adequate supervision
- Production and use of mercury-contaminated products in accordance with the Minamata Convention
- Illegal treatment of mercury waste in accordance with the Minamata Convention
- Illegal production and use of persistent organic substances in accordance with the Stockholm Convention
- Import or export of hazardous waste in accordance with the Basel Convention

2. Who can report a complaint?

Complaints can be reported by affected and third parties (Section 8 (1) sentence 1 LkSG) as well as by potential participants in the supply chain (Section 8 (4) sentence

2 LkSG). The complaints procedure is available internally and externally. At no time does Zurich charge for the disclosure of complaints and hints.

3. Protection of identity – anonymity

Zurich takes precautions to ensure the confidentiality of the complainant's identity and the protection of their personal data. For this purpose, it is possible to create and use a secure mailbox, which can be used for anonymous communication.

4. Complaint channel

Complaints under the LkSG regarding human rights and environmental risks or violations can be submitted via the dedicated tool. The tool enables prompt communication via a secure mailbox.

5. The complaints procedure (the time schedule)

a) Step 1: Receipt

Upon receipt of the complaint the reporting office will check whether the complaint falls within the scope of the complaints procedure. If this is the case, it will be taken care of.

If it does not fall within the scope, it will be referred to the responsible department at Zurich.

The whistleblower will receive a confirmation of receipt within 7 days and, if applicable, an explanation for the referral.

b) Step 2: Evaluation of the report

After receipt of the report, it is assessed and classified as reported misconduct (triage) or as a risk for the whistleblower and relevant interested parties (disadvantages) in order to be able to take suitable measures in the next step.

c) Step 3: Taking action

The reporting office investigates the report.

The contact person discusses the facts with the reporting person with the aim of gaining a better understanding of the case. They will also discuss the whistleblower's expectations with regard to possible preventive or remedial measures.

The whistleblower may be offered an amicable dispute resolution procedure.

Follow-up information and answers to further questions from the whistleblower may be required.

d) Step 4: Conclusion

The complainant will receive feedback within 3 months of submitting the complaint. This feedback may take the form of a recommendation or a decision.

III. Preventive and remedial measures

Appropriate preventive and remedial measures will be taken in accordance with the reported facts to resolve the complaint in order to bring about a mutually satisfactory end to the proceedings.

IV. Contact persons

The person entrusted with handling the complaints procedure must offer a guarantee of impartiality and be obliged to maintain confidentiality. In the present case, Dr. Nina Schlierenkämper, Chief Compliance Officer of Zurich Group Germany has been entrusted with handling the complaints.

V. Protection against discrimination or punishment

Zurich will not tolerate retaliation against anyone who raises a concern in good faith. The protection against retaliation extends to those involved in the investigation of such concerns and, where appropriate, to other persons involved.