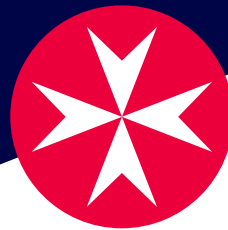




**JOHANNITER**



# **Rules of Procedure of Johanniter-Unfall-Hilfe e.V.**

for the complaints procedure under the  
German Supply Chain Act (LkSG)

May 2026

Aus Liebe zum Leben

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## Preamble

Respect for human rights and the sustainable protection of our environment are of central importance to Johanniter in relation to its own actions and the actions of suppliers in supply chains. We at Johanniter are also committed to this guiding principle in our Declaration of Principles on Respect for Human Rights.

As an important element of compliance with human rights and environmental due diligence obligations within the meaning of the LkSG, we have an internal **complaints procedure/whistleblower** system. Among other information, reports on human rights and environmental risks and violations can be submitted via this system.

Such reports enable us to identify human rights and environmental risks in our supply chains at an early stage, prevent their occurrence, and remedy violations. They can also help us to continuously adapt and improve our processes for complying with due diligence obligations in relation to human rights and environmental-related violations in our supply chains. Your help is therefore important to us.

These rules of procedure set out the most important elements of our complaints procedure and your position as a whistleblower. If you have any further questions, please get in touch with the following reporting channels or contact persons (see below).

## I. Who can submit a report?

In general, anyone. The complaints procedure is open to all persons/groups of persons who are affected by or become aware of a human rights or environmental protection violation or risk.

This includes, for example:

- Employees of direct or indirect business partners/suppliers
- Employees of Johanniter-Unfall-Hilfe e.V. and its subsidiaries
- Customers
- Relatives of employees
- Residents around Johanniter-Unfall-Hilfe sites
- Trade unions, NGOs, or other third parties

## II. What kind of reports can the complaints procedure be used for?

The complaints procedure can be used to report human rights and environmental risks as well as violations of human rights or environmental-related obligations that have arisen as a result of the actions of Johanniter-Unfall-Hilfe e.V. and its companies in its own business area or in the supply chain.

- **Human rights** include in particular: prohibition of child labour, forced labour and slavery, disregard of occupational health and safety standards, disregard of freedom of association, discrimination and equality of employees, withholding of adequate remuneration for work performance, prohibition of pollution and requirement to preserve natural resources such as soil, water, air, emissions<sup>1</sup>, disregard of land rights, violence by private and public security forces.
- **Environmental violations/risks** arise in particular when it concerns the prohibited handling of hazardous substances (such as mercury, chemicals or hazardous waste) for humans and the environment.<sup>2</sup>

It does not matter whether the report concerns an incident in Germany or a different country. Our complaints procedure applies both in Germany and in all countries in which Johanniter International Assistance is active.

## III. How can a report be submitted?

Reports can be submitted **openly or anonymously** to our internal reporting centre via the digital whistleblower portal or to an external ombudsperson. If you would like to make a report, please use the following complaint channels:

- **Portal for whistleblowers of Johanniter-Unfall-Hilfe**
- (<https://johanniter-portal-hinweisgeber.integrityline.app/?lang=en>)  
The whistleblower portal is accessible to the public through the Johanniter-Unfall-Hilfe e.V. website.
- **Send an email to us at:** [hinweismeldestelle@johanniter.de](mailto:hinweismeldestelle@johanniter.de)

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<sup>1</sup> For detailed information, see Section 2 of the LkSG, the explanatory memorandum to the law, and the handouts from the BAFA (German Federal Office for Economics and Export Control).

<sup>2</sup> See Footnote 1; see Minamata Convention on the control of mercury emissions; Stockholm Convention on Persistent Organic Pollutants; Basel Convention on the Control of Transboundary Movements of Hazardous Wastes.

- Or confidentially contact our **ombudsperson**:

Frau RAin Dr. Maria-Rebecca Legat,  
c/o Tavanti, Redeker & Partner  
Rechtsanwälte Partnerschaft mbB,  
Gutenbergstr. 2, 10587 Berlin  
Tel: +49 (0)30 - 99 40 49 49  
[ombudsperson-juh\(at\)tavanti-redeker.com](mailto:ombudsperson-juh(at)tavanti-redeker.com)

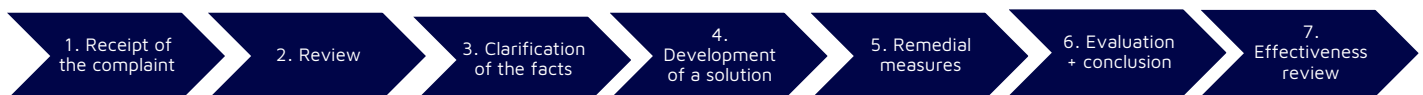
## IV. Who processes the report?

Reports received via our internal reporting office are processed by our **Johanniter Compliance Team**. The members of the compliance team act impartially, are independent, and are not bound by instructions. They are also professionally experienced and bound to confidentiality. Access to the submitted information is restricted to those persons who absolutely need this information to process a case ("need-to-know" principle).

At the national head office of Johanniter-Unfall-Hilfe e.V., overall responsibility lies with the head of the Legal Department, the head of the Central Operations Management Department, and the head of the Central Human Resources Department ("corporate supervisor"). The specific assignment to the responsible case handler in the compliance team is based on the content of the report ("report category").

- Reports in the category of "Reports of risks or violations relating to human rights or environmental-related obligations" are processed by our **human rights officer**.

## V. How does the complaints procedure work?



### 1. Receipt of the complaint

The human rights officer receives your report and documents it as a new case in the digital complaints system. You will receive an acknowledgement of receipt within seven days.

## **2. Review**

The complaint is checked for plausibility. The further procedure and responsibilities are determined. In particular, the team checks whether the matter falls within the scope of the complaints procedure and whether it requires further clarification. If a complaint is not accepted, you will receive feedback within one month.

## **3. Clarification of the facts**

The facts of the case will generally be clarified within three months. As a rule, the facts of the case will be discussed with you as the complainant at this stage of the procedure, provided that contact is desired and possible.

## **4. Development of a solution**

A proposed solution will be developed on the basis of the facts of the case. If you are affected as the whistleblower, the proposed solution will be discussed with you. Otherwise, you will be informed of the proposed solution. Compliance with data protection regulations may influence the scope of the information.

## **5. Remedial measures**

Agreed remedial measures will be implemented and followed up promptly.

## **6. Evaluation and conclusion**

The implementation of the agreed measures will be reviewed and evaluated. A final report is prepared, and you will then receive a final message.

## **7. Effectiveness review**

The effectiveness of the complaints procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments are made to the procedure or corrective measures are taken.

## **VI. Is confidentiality maintained?**

The confidentiality of your identity as the whistleblower, the person who is the subject of the report, and other persons named in the report is our top priority at every stage of the procedure. We therefore ensure that the complaint is handled confidentially in our reporting channels. The whistleblower portal allows you to set up a secure mailbox through which you can communicate with the relevant compliance team member while maintaining the confidentiality of your identity or remaining anonymous. It fulfils the

necessary requirements for absolute anonymity, data protection and IT security. As a lawyer, the external ombudsperson is obligated to maintain confidentiality.

## VII. How is the whistleblower protected?

We protect people who provide us with information in good faith. We will not tolerate any discrimination or penalisation of a whistleblower on the basis of a report. Such retaliation constitutes serious misconduct and will be punished accordingly.

### **Thank you!**

Protecting the human rights of every individual and protecting the environment from risks are important to us. You can support us with your report. We would like to thank you for doing so!