

## Rules of Procedure

for the companies in the Versicherungskammer Bayern regarding the complaints procedure required by the Supply Chain Due Diligence Act (LkSG).

Central Compliance Function

### **1. What do these rules of procedure regulate?**

A complaints procedure has been set up in the companies of the Versicherungskammer Bayern in accordance with the requirements of the Supply Chain Due Diligence Act (LkSG). It enables people to point out human rights and environmental risks as well as violations of human rights and environmental obligations that have arisen through the economic activities of one of the companies in the Versicherungskammer Bayern in their own business area or in their supply chains. We therefore attach great importance to making our rules of procedure accessible to our suppliers and their employees in appropriate cases.

### **2. Who can report risks, possible breaches of duty or violations?**

Anyone can report human rights or environmental risks affecting our business or supply chains to us. Information about a possible violation of human rights-related or environmental obligations can be made via our reporting office.

### **3. What risks, possible breaches of duty or violations can be reported to us?**

What risks, breaches of duty or violations these are are regulated in the LkSG and there in §2:

- Employment of children
- Worst forms of child labor (such as slavery and similar practices, prostitution/pornography, illicit activities such as drug trafficking, work that endangers health, morals and safety)
- Employing people in forced labor
- Forms of slavery or similar practices
- Failure to comply with (local) occupational health and safety obligations
- Disregard for freedom of association
- Unequal treatment in employment (due to gender, age, sexual orientation...)
- Withholding a minimum wage (depending on the applicable law or the law of the place of employment)
- Harmful soil change, water and air pollution, harmful noise emissions, excessive water consumption
- Illegal. Forced eviction and deprivation of land, forests and water
- Commissioning of private or public security forces to protect company projects (there is a risk of inhumane treatment, impairment of freedom of association and coalition, danger to life and limb)
- Production, use and disposal of mercury
- Production and use of certain chemicals (persistent, organic pollutants)
- Non-environmentally sound waste treatment
- Export of hazardous waste and its import (including other waste)

#### 4. Who takes care of information at the companies in the **Versicherungskammer Bayern**?

The central compliance function of the companies in the Versicherungskammer Bayern is the central office that takes care of incoming tips or reports as well as answering and processing these reports. It also observes data protection regulations and requirements.

The central compliance function acts impartially and independently and its employees are obliged to maintain confidentiality. At the whistleblower's request, it will maintain the confidentiality of his/her identity. The independence of the compliance function, which is already required by supervisory law, is additionally supported by a corresponding commitment from the respective management. For example, by suppressing the identity of the whistleblower, it ensures that whistleblowers are protected from discrimination of any kind or punishment based on their complaint in connection with the complaint they have submitted.

Discrimination or punishment of a whistleblower by the companies in the Versicherungskammer group due to a complaint will not be tolerated.

#### 5. Where can a tip be submitted

The central compliance function can be accessed as follows:

by post or in person at

Versicherungskammer Bayern  
Central compliance function 1H1CC  
Maximilianstrasse 53  
80530 Munich

or

by email at

[compliance@vkb.de](mailto:compliance@vkb.de)

## 6. How are reports received handled?

As soon as the central compliance function receives a tip, it documents the tip and sends the whistleblower(s) a confirmation that the tip has been received. At the same time - if contact is possible - the whistleblower will be made aware of the next steps, the timing of the procedure and his/her rights with regard to protection against discrimination as a result of the tip-off.

The central compliance function immediately checks whether the notice describes an issue in sufficient detail that can be investigated.

If this is not the case, the whistleblower will be contacted as soon as possible and asked to provide additional information. If the tip is made anonymously, the facts are not sufficiently described and there is no possibility of contacting the whistleblower, the process will be closed.

If the description of the facts is sufficiently specific, the clarification of the facts will begin and the affected areas in the group companies or the affected suppliers will be approached. If necessary, the content of the report and the facts will be discussed with the affected areas and the matter will be urged to be completed immediately. Any wish of the whistleblower for confidentiality or anonymity will be observed.

If necessary, the central compliance function calls in other functions such as the legal department or internal audit to clarify the matter or to carry out a legal assessment. The urgency of the process is also suggested to these functions.

If, in the opinion of the Central Compliance Function, the internal investigations reveal that there is neither a human rights or environmental risk nor a violation of human rights or environmental obligations, the process will be completed and the whistleblower will be contacted - if contact is possible - informed about this and asked for feedback on the course of the procedure and the results of the investigation.

However, if a human rights or environmental risk or a violation of human rights or environmental obligations is identified, the central compliance function initiates the necessary measures with the aim of reducing the risk and eliminating the violation.

Where appropriate and possible, the whistleblower will be included if necessary.

The implementation of the necessary measures and their effectiveness are monitored by the central compliance function.

If possible, the whistleblower will be informed about the completion of the procedure and any questions will be answered.

The complaint procedure is then ended.

### **7. Review cycle**

The central compliance function reviews these rules of procedure regularly, usually annually, for any need for adjustments or changes. If necessary, the adjustment will also be made during the year.

**8. To which companies do these rules of procedure apply?**

Versicherungskammer Bayern Versicherungsanstalt des öffentlichen Rechts (VKB AdöR)
Versicherungskammer Bayern Konzern-Rückversicherung AG (VKB-Rück)
Bayerische Landesbrandversicherung Aktiengesellschaft (BLBV)
Bayerischer Versicherungsverband Versicherungsaktiengesellschaft (BVV)
Bayern-Versicherung Lebensversicherung Aktiengesellschaft (BL)
Consal Beteiligungsgesellschaft Aktiengesellschaft (Consal)
Bayerische Beamtenkrankenkasse Aktiengesellschaft (BK)
Union Krankenversicherung Aktiengesellschaft (UKV)
Union Reiseversicherung Aktiengesellschaft (URV)
Feuersozietät Berlin Brandenburg Versicherung Aktiengesellschaft (FS)
BavariaDirekt Versicherung AG (BDAG)
SAARLAND Feuerversicherung (SF)
Versicherungskammer Bayern Pensionskasse AG (VKB PK AG)
Versicherungskammer betriebliche Vorsorge GmbH
Versicherungskammer Bayern Versicherungs- und Vorsorgevermittlung GmbH
UBB Vermögenverwaltungsgesellschaft mbH
Medi Risk Bayern Risk-Rehamanagement GmbH
Tecta Invest GmbH
Bayerische Versicherungskammer Landesbrand Kundenservice GmbH
Insure Connect GmbH
FidesSecur Versicherungs- und Wirtschaftsdienst Versicherungsmakler GmbH
Uptodate Ventures GmbH
Obelisk Vermögensverwaltungsgesellschaft mbH
Bavaria Versicherungsvermittlungs GmbH
S-Finanzvermittlung und Beratung GmbH
Finanzkonzept Saarpfalz GmbH
Nummer Sicher Versicherungsvermittlung Sankt Wendel GmbH
Consal Service GmbH
Consal Versicherungsdienste GmbH
Versicherungskammer Maklermanagement Kranken GmbH
Inverso Gesellschaft für Innovative Versicherungssoftware mbH
VKBIt Betrieb GmbH
Consal Vertrieb Landesdirektionen GmbH
Versicherungsservice MFA GmbH