

Rules of procedure for the complaint procedure in accordance with Section 8 of the Supply Chain Due Diligence Act (LkSG)

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* A notice:

When referring to people or groups of people in this document, for the sake of linguistic simplification and better readability, people of any gender are meant below. The term “employees” also includes managers at all levels and members of executive bodies.

1. Introduction - Background and purpose of the complaint procedure

As part of its corporate activities, **mister★lady GmbH** (hereinafter also simplified: **mister★lady**) is fully committed to its social responsibility and takes human rights, environmental protection, integrity and rule-abiding behavior within the company and along our supply chains very seriously. Accordingly, fulfilling human rights and environmental due diligence obligations is a high priority for mister★lady. This includes ensuring fair, safe and healthy working conditions both in our own business area and in our supply chain.

The **Supply Chain Due Diligence Act (LkSG for short)** aims to improve the protection of human rights and the environment in companies' own business areas and along their supply chains. To this end, the law prescribes a series of due diligence obligations for the companies concerned. Among other things, the LkSG requires that companies must have an appropriate and effective complaints procedure through which both internal (i.e. employees) and external persons (such as suppliers) can report information about human rights and environmental risks or violations both in their own business area and along their lines supply chains.

Accordingly, mister★lady has set up an effective complaints procedure through which reports of human rights and environmental risks or violations can be made. mister★lady's complaint procedure is an important part of preserving the company's values and commitments and serves to find out about potential grievances and to remedy them as quickly as possible.

These procedural rules provide information about the essential features of the complaints procedure, access to the procedure and its accessibility as well as responsibilities. It also provides information about what happens to incoming reports and complaints and how to find a solution to reported grievances. It is important for mister★lady to present this information in an understandable and comprehensible manner and to create the greatest possible transparency about the process.

2. Who can file a complaint?

Any person or organization that is directly affected or represents the interests of a person or group directly affected, or has knowledge of a risk or breach, may make a complaint that meets the definition set out in paragraph 3. The complainant should have precise information about the complaint case (see paragraph 4).

3. What can be reported?

All indications of possible human rights or environmental risks or violations that have arisen as a result of mister★lady's economic activities in the business area or in the supply chain can be reported via the complaint procedure.

The **human rights risks and violations** include in particular:

- Child labor;
- forced labor and slavery;
- Health-endangering working conditions, disregard for occupational safety;
- discrimination and unequal treatment in the workplace;
- Contamination of water, soil and air, which can contribute to human rights violations.
- Etc.

Environmental **risks and violations** include in particular:

- Use of mercury (according to Minamata Convention);
- Use of persistent organic pollutants / POPs (according to the Stockholm Convention);
- Non-environmentally sound storage, handling, import and export of hazardous waste (according to the Basel Convention).

4. What information should a complaint contain?

In order for a complaint to be dealt with appropriately, it is important that it is as specific as possible. Information on the following questions is particularly helpful:

- Who? - Who is the person you are talking about? Who is affected?
- What? - What happened? Description of the facts (the more detailed, the better).
- When? – When did the incident occur? Is the violation still ongoing?
- How? – How many times has it happened?
- Where? – Where did the incident occur?

The information mentioned above makes it easier and faster to process a report properly. However, it is not a prerequisite for processing that the report contains information on all of the points mentioned.

5. Are anonymous complaints possible?

Yes. mister★lady also follows up on anonymous tips. An anonymous reporting option exists, among other things, via mister★lady's digital complaint system (see section 6.2). In order to ensure that anonymous complainants can be contacted for any questions or feedback, the (voluntary) option to set up a protected account has also been created.

6. What complaint channels are available?

mister★lady has set up the following channels for reporting complaints:

6.1. Email and postal mail

Complaints can be sent directly to mister★lady's complaints office:

- by email to: sustainable@mister-lady.com
- by post to mister★lady GmbH, Westend 1, D-91126 Schwabach - Germany

Complaint office: **SUSTAINABLE**

6.2. Digital complaint system from mister★lady for the LkSG

Complaints can be submitted via mister★lady's digital complaint system regarding the LkSG. This system can be accessed via the following link and QR code:

https://mister-lady.com/Beschwerdeverfahren_LkSG_complaints_supply_chain_act



The digital complaint system platform is operated by **MKM Compliance GmbH** (Leipziger Platz 9, 10117 Berlin). It is accessible worldwide. The tool can currently be used in 10 languages (expansion of additional languages is planned). The system meets the highest security standards using modern encryption algorithms, high-security data centers and manual penetration analyzes by independent experts. Technical safety according to DIN ISO 27001 is ensured. The use of the digital complaint platform and all data processing are carried out in accordance with the requirements of the General Data Protection Regulation (GDPR). Using the system to submit a complaint is free of charge.

The report can be made by name or anonymously. The complaint system allows the complainant to set up an anonymous account via the platform (voluntary). This allows anonymous two-way communication between the complainant and mister★lady.

6.3. Internal channels

There are also other internal channels and contact points available for complaints from employees, which are communicated within the company. In particular, complaints from employees can be directed to the respective manager and to mister★lady's human resources department.

7. Procedure after receiving a complaint

The complaint will be examined and processed in accordance with the legal requirements and taking into account the handouts and instructions from BAFA. The process is as follows:

7.1 Confirmation of receipt

Receipt of the complaint will be confirmed to the complainant immediately, within a few days, provided that contact details were provided when the complaint was submitted or an account was set up via the digital complaint platform.

7.2 Initial test

In a first step, mister★lady's complaints office checks whether the complaint relates to human rights and environmental risks and violations in accordance with Section 3 above.

It is also checked whether there is enough information for further processing. If this is not the case, the complainant will be contacted (if possible) or otherwise attempt to obtain the missing information.

The complainant will be informed promptly, explaining the reasons, if the complaint is not considered valid or does not fall within the scope of application. Otherwise, the report will be checked objectively (see section 7.3 below).

During the initial evaluation and, if necessary, during the factual examination, mister★lady is carried out by the law firm **MKM + PARTNER Rechtsanwälte PartmbB** (Äußere Sulzbacher Str. 124 a, 90491 Nuremberg) supported the legally compliant implementation of the complaint procedure. In this respect, data protection and confidentiality are also maintained in accordance with legal requirements.

7.3 Factual examination of the complaint – clarification of the facts

The reported matter is being examined. Where possible, a discussion will also take place with the complainant. Where possible, the complainant will be actively involved in case processing when examining the facts.

The mister★lady complaints office will - if necessary in collaboration with the relevant company office - take the necessary measures to clarify the reported matter, such as internal interviews/discussions, review of documents and/or production sites, etc. If necessary External help is used, for example from local forces or service providers.

The complaints office informs the complainant immediately if the complaint is rejected as unfounded and gives reasons for this.

7.4 Developing solutions and remedial measures

If the complaint proves to be justified, a solution proposal will be developed based on the facts identified. If the complainant himself is affected, this will be discussed with him. mister★lady will endeavor to involve the complainant as much as possible in developing a solution.

Optionally, a procedure for amicable dispute resolution may be available, which mister★lady will inform the complainant about if such a procedure is considered in the specific case.

If, in the course of clarifying the facts, it is determined that a violation of human rights and/or environmental obligations is imminent or is already taking place, remedial measures will be taken immediately. This includes, for example, discussions with suppliers to develop a concept for ending or minimizing the violation, as well as personnel measures, adjustments to processes and even the termination of business relationships. If remedial measures have been agreed, their implementation will be consistently tracked.

In the event of violations caused directly by mister★lady, mister★lady will actively endeavor to remedy the violation. In addition, mister★lady will take measures to prevent such a violation from occurring in the future.

In the event of violations that were caused by direct or indirect suppliers or contractual partners of mister★lady, but for which mister★lady is not causally responsible or to which mister★lady has not contributed through its actions, mister★lady will use its influence to work towards resolving the injury.

7.5 Verification of the remedy and completion of the procedure

The implementation of the proposed solution and the remedial measures is checked and the result of the procedure is evaluated. As far as possible and sensible, this is done together with the complainant.

8. Essential procedural principles

mister★lady strives to investigate all reports and complaints in a fair, balanced and transparent manner and to resolve them as efficiently and effectively as possible. Uniform processes and confidential and professional processing of reports by internal experts form the basis of the complaint procedure. The following procedural principles apply in particular:

8.1 Objectivity and presumption of innocence

All complaints or tips will be processed neutrally, objectively, appropriately and in compliance with the presumption of innocence. Just as clues that incriminate suspected persons are also investigated, those that can exonerate them are also investigated.

8.2 Compliance with the principle of proportionality and the right to be heard

All fact-finding measures must respect the principle of proportionality, meaning they must be appropriate, necessary and proportionate to achieve their purpose. Accused persons must be treated fairly and respectfully and the fundamental right to be heard must be taken into account.

8.3 Confidentiality principle, documentation and data protection

The confidentiality of information obtained, especially personal data, must be guaranteed. Regardless of which reporting channel the complainant chooses, mister★lady will treat the complaint confidentially. Confidential information may only be disclosed if necessary and legally permissible. Process processing is documented confidentially and with access protection.

Personal data is processed in accordance with the European General Data Protection Regulation (GDPR), including the storage and deletion of data and the regulations on international data transfer.

8.4 Protection against reprisals

mister★lady ensures that complainants do not suffer reprisals as a result of their complaint. Business partners are obliged to ensure this as part of their business relationships (e.g. through the Supplier Code of Conduct).

8.5 mister★lady's complaint office

The employees of mister★lady's complaints office work impartially and independently when processing complaints to the extent necessary. You are obliged to maintain confidentiality. While maintaining data protection and confidentiality, the complaints office can call in experts from within and outside the company to process the complaint.

9. Reporting

The effectiveness of the complaints procedure is checked (at least) once a year. If the complaints received indicate the need for an event-related review, this will be carried out promptly. It is evaluated whether the cases were processed as planned (if possible) in coordination with the complainant. In addition, it is examined whether and to what extent the remedial measures were successful. Advice from complainants and other involved parties to improve the process will be taken into account.