

## **Rules of procedure for complaints in accordance with the German Supply Chain Act (LkSG)**

Scout24 SE (“Scout24”) assumes responsibility for respecting and strengthening internationally recognized human rights within its own business areas and through appropriate management of its supply chains. Scout24 implements all requirements of the German Supply Chain Due Diligence Act (LkSG) in order to fulfill human rights and environmental due diligence obligations and maintains compliance with them. Establishing an effective complaint procedure is a crucial element of these due diligence obligations in order to receive reports on potential human rights and environmental risks or violations.

The present procedural rules provide information on the key features of the complaint procedure, access to the procedure or its availability, as well as the responsibilities involved. Furthermore, it provides information about how incoming reports and complaints are processed. Scout24 considers it important to present this information in a clear and comprehensible manner and to create the greatest possible transparency about the process.

### **What is the purpose of the complaint procedure?**

The complaint procedure is intended to provide every individual or group of individuals with the opportunity to submit relevant complaints or information to Scout24, thereby drawing attention to human rights and environmental risks in accordance with the German Supply Chain Act (LkSG). It thus serves as an early warning system. However, persons or groups of persons are also given the opportunity to report suspected violations, so that damage can be immediately averted or minimized and access to appropriate remedy can be ensured.

### **Who is the complaint procedure aimed at? Who can submit complaints or reports?**

Any individual or group of individuals is entitled to report information or complaints regarding potential human rights or environmental risks and violations, regardless of whether they occur domestically or abroad.

### **What types of reports or complaints can be submitted?**

The complaint procedure enables individuals to report human rights and environmental risks, as well as to violations of human rights or environmental obligations that have arisen through the economic activities of Scout24 and their affiliated companies, whether within their own business area or in the supply chain.

### **How can I submit complaints or information?**

Complaints and information can be submitted at any time in German or English to our [Legal Ombudsman \(“Vertrauensanwalt”\)](#):

Dr. Rainer Frank

Phone: 0049 30 31 86 85 79

Email: [compliance-scout24@fs-pp.de](mailto:compliance-scout24@fs-pp.de)

Those who wish to submit complaints or information anonymously can contact the ombudsman of Scout24 via the [BKMS® System](#). The BKMS® System is an internet-based reporting system that has been tested by many large companies, organizations, and even police authorities, ensuring maximum security and excluding the traceability of reports.

Our reporting system thus provides a way for the reporting individual to communicate confidentially and, if necessary, anonymously with Scout24. Compliance with all relevant data protection regulations is ensured.

Inquiries that do not fall within the scope of this complaint procedure, such as advertising or customer service inquiries, will not be forwarded and not answered.

## **Who processes the complaints and information?**

Complaints or information are received by our Legal Ombudsman and then confidentially passed on to selected employees of Scout24 for processing. All employees who are responsible for handling these matters possess the following characteristics:

They are

- impartial,
- independent,
- not bound by instructions,
- obligated to confidentiality,
- appropriately trained,
- equipped with sufficient time resources.

## **How does the complaint procedure work?**

- Once a complaint or tip has been received, the person providing the tip receives a confirmation. This confirmation of receipt is sent within two weeks.
- Throughout the entire process, Scout24 or the affected affiliated companies remain in contact with the person providing the tip, if desired and if a corresponding contact option exists.
- Initially, complaints or reports are fundamentally reviewed to determine whether the reported issue represents a human rights or environmental risk, or a violation of human rights or environmental obligations. This also involves determining which Scout24 company or supplier is affected by the report. The complaint or report is then forwarded anonymously to the responsible department, e.g. within a company.
- The next step is to clarify the facts of the case, which generally takes place within three months. If it is determined that a violation of human rights and/or environmental obligations is imminent or has already occurred, immediate remedial measures are initiated.

- The employees involved in the complaint procedure follow up to see whether and to what extent the remedial measures are implemented.
- Finally, a proposal for further action is drawn up based on the findings of the investigation.

### **How are people protected from discrimination and reprisals due to a complaint or information?**

Protecting people who submit complaints or information from being discriminated against or penalized as a result of complaints or information they submit is an important part of our complaint process.

The following measures have been put in place to protect people who provide information:

- All complaints and information are processed by selected employees only.
- All information, such as personal data and other information that could reveal the identity of the individual providing the information, is treated confidentially. This also applies after the completion of the complaint procedure.
- In accordance with legal requirements, internal company documentation is retained for seven years and then destroyed.

Scout24 protects people who submit complaints or information from being discriminated against or penalized as a result of a complaint within the scope of its legal influence.

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