

Rules of Procedure of the R+V Insurance Group for Complaints Procedure under the Act on Corporate Due Diligence Obligations in Supply Chains

1 Objective

The Management Board of R+V Versicherung AG has established a Complaints procedure for the R+V Insurance Group (hereinafter referred to as R+V), which enables all individuals to raise awareness of human rights and environmental issues, as well as violations of human rights or environmental obligations within the meaning of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), arising from the business activities of R+V's own business area or those of a direct supplier of R+V.

2 Scope of application

The Complaints procedure is intended for anyone wishing to report potential violations of human rights or environmental obligations. This includes particularly all natural and legal persons directly affected by such breaches. In principle, any other persons who can provide relevant information on breaches of due diligence obligations can also utilize the complaints procedure.

The complaints procedure allows for raising awareness of human rights and environmental issues, as well as violations of human rights or environmental obligations by R+V or immediate suppliers. Human rights risks are listed in § 2 paragraph 2 LkSG, while environmental issues are outlined in § 2 paragraph 3 LkSG.

3 Framework

Confidential handling of information and protection of the whistleblower is a central principle of the Complaints procedure. The identity of the whistleblower - if known - will only be disclosed to selected R+V employees involved in the process.

The central unit for receiving and responding to reports is located within the Compliance function. Employees assigned to handle reports are independent and not bound by directives. They are obligated to maintain confidentiality.

The whistleblower can choose to remain anonymous or disclose their identity. Retaliation against the whistleblower due to a complaint will not be tolerated.

Handling of reports complies with data protection regulations. No costs are incurred for conducting the procedure.

4 Procedure of the Complaints Process

The complaints procedure generally consists of the following process steps:

- Receipt of the report
- Initial assessment of the report
- Clarification of the report with the whistleblower (if possible)
- Analysis of the report and, if necessary, derivation of measures
- Feedback to the whistleblower (if possible) and conclusion

Receipt of the Report

For submitting a report, the following reporting channels are available:

By Mail:

R+V Insurance

Compliance Function (VV-KJ)

- personal -

Raiffeisenplatz 1

65189 Wiesbaden

By phone (during regular office hours):
0611 533-4474

By Email:
G_LkSG@ruv.de

The whistleblower - if possible - generally receives a confirmation of receipt within seven days of the report being received.

Initial Assessment of the Report

Within a period of generally 10 working days, it is assessed whether the report falls within the scope of the Complaints procedure.

If the assessment determines that the report does not fall within the scope of it, the report will be forwarded to other organizational units or functions in consultation with the whistleblower. The whistleblower will then - if possible - receive information from these units or functions about the further process. If the report is not processed due to lack of relevance, the whistleblower will - if possible - receive information with corresponding justification.

If the assessment determines that the report falls within the scope, the report will be processed according to the following steps.

Clarification of the Report with the Whistleblower (if possible)

The report will be further clarified in dialogue with the whistleblower within 10 working days of the initial assessment, to gain a better understanding of the situation for further processing.

Analysis of the Report and Derivation of Measures

Based on the situation, the report will be analyzed within 10 working days after clarification. Based on the analysis, if necessary, case-specific proposals for appropriate measures will be developed, possibly involving the whistleblower, to address the risk. The proposal will be brought to the attention of the Management Board of R+V.

Feedback to the Whistleblower (if possible) and Conclusion

Within 10 working days after the decision of the Board, the whistleblower will be informed of the outcome by the central unit. Queries will be discussed with the whistleblower.

This concludes the complaints procedure.

5 Effectiveness Review

The effectiveness of the Complaints procedure is reviewed annually and event-related. Changes to the procedure are made if identified improvement opportunities arise.

Wiesbaden, April 2024