

# DHL Incident Management

## Rules of Procedure for the integrated Whistleblowing- und Grievance Mechanism

### § 1 Subject matter and scope of application

- (1) These Rules of Procedure describe the anonymously usable DHL Incident Reporting System as well as the underlying Incident Management process within Deutsche Post DHL Group (DHL Group).
- (2) With the Incident Management process, DHL Group maintains a uniform Group-wide standard for Report and Case Management. The Incident Management process regulates the receipt of information about company-related legal violations, violations of the DHL Code of Conduct for Employees and the further codes of conduct mentioned therein, in particular the Supplier Code of Conduct and the Human Rights Policy Statement. With the rules and standards contained therein, the Code of Conduct forms an ethical compass for the daily conduct of DHL Group employees worldwide in their day-to-day work. The Supplier Code of Conduct defines the DHL Group's expectations of suppliers, including subcontractors, i.e. all companies that have a business relationship with a company or a division of the DHL Group, that they base their actions on the same ethical principles. The Supplier Code of Conduct thus sets minimum standards for business relationships with a Group company or a corporate division of the DHL Group. The Human Rights Policy Statement supplements the Code of Conduct for Employees. In this DHL commits all employees worldwide to appropriate and lawful conduct and formulates the expectation for partners to pass on the commitment to respect human rights to business partners, to act ethically and with integrity.

Case management sets the standards for downstream fact-finding within DHL Group. An elementary component of case management is the DHL Incident Reporting System and the process behind it. The DHL Incident Reporting System represents, among other things, the implementation of the requirements from Directive (EU) 2019/1937, several derived national EU Member State laws as well as the Supply Chain Due Diligence Act for the creation of channels for reporting legal violations and complaint mechanisms regarding human rights and environmental risks or breaches of duty.

- (3) These Rules of Procedure serve as information for potential and actual Reporters<sup>1</sup> who wish to submit a corresponding whistleblowing report or complaint. Reporting parties may be Group employees or external third parties. Employees of the DHL Group are encouraged to report suspected violations of the Code of Conduct as well as of the further codes of conduct

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<sup>1</sup> For linguistic simplification, these Rules of Procedure use the term Reporter, which includes both whistleblowers and complainants. Information provided by a whistleblower about a violation or serious malpractice is consequently referred to as a Report.

mentioned therein, in particular the Supplier Code of Conduct and the Human Rights Policy Statement.<sup>2</sup>

(4) These Rules of Procedure shall apply to all companies of Deutsche Post DHL Group.

## **§ 2 Responsible bodies in the Group**

The Global Compliance Office ("GCO") is responsible for the central and global coordination of reporting and case management. The GCO is headed by the Chief Compliance Officer, Dept. 718. In addition, there is a regional and functional compliance organization. The "Business Unit Compliance Offices" ("BUCCO") are responsible for the local coordination of reports on compliance-related topics in their business unit (division) and form the interface to the GCO. In addition, "Human Rights Case Coordinators" ("HuRiCC") from the HR departments of the business units have been set up for the local coordination of reports on topics with human rights and general HR relevance in the respective business units (division). These also act as the interface to the GCO as the head of reporting and case management.

## **§ 3 Short description and purpose of the DHL Incident Management**

(1) The DHL Incident Management works with the two connected subsystems "DHL Incident Reporting System" and "Case Management System". The DHL Incident Reporting System is used by Reporters to submit information or complaints via a telephone voice intake module or via a web-based module, i.e. Reporters can report company-related legal violations, violations of the Code of Conduct and the further codes of conduct mentioned therein, in particular the Human Rights Policy Statement and the Supplier Code of Conduct, by telephone or online via PC or Internet-enabled mobile device.

(2) The Case Management serves for documentation of internal investigations of DHL.

(3) The DHL Incident Reporting System is operated by a contracted service provider. The Voice Intake Module and the web-based module can be accessed anonymously 24 hours a day, 7 days a week. To use the web-based module, the service provider's website can be accessed directly or via the DHL Group intranet pages. The DHL Incident Reporting System can be accessed at:

[www.dpdhlcompliance.com](http://www.dpdhlcompliance.com)

(4) DHL Group employees are informed about the possibility of using the DHL Incident Reporting System in an appropriate manner (e.g. intranet page of the Compliance Organization, notices, email). External reporting parties can obtain information via the company website [www.dpdhl.com](http://www.dpdhl.com).

(5) The DHL Incident Management serves to clarify and prevent company-related legal violations and violations of the Code of Conduct and the additional behavioral guidelines mentioned therein, in particular the Supplier Code of Conduct and the Human Rights Policy Statement. The DHL Incident Reporting System supports and protects reporting parties in the reporting of such offenses by providing options for the anonymous recording of incoming Reports and for anonymous communication with reporting parties.

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<sup>2</sup> Depending on the nature of the complaint, this includes not only the DHL Incident Reporting System but also the other existing complaint and dispute resolution procedures via employee representatives, HR departments or local management. Group outsiders have the option of using the DHL Incident Reporting System.

## § 4 Procedure for submission of whistleblowing reports and grievances

The following steps will take place in the course of processing a Report:

### 1. Variant A: Usage of the DHL Incident Reporting System by the Reporter

The Reporters contact the Voice Intake Module via a toll-free or local number or use the Web Module and leave a message. The reporters are given the option to set up an anonymous mailbox for anonymous or confidential communication. For the anonymous mailbox, the reporter chooses a pseudonym and a password. This password is then used for anonymous communication with the person processing the Report.

### Variant B: Manual entry of a Report by a user of the system

If the GCO, BUCO organization or HR organization receives a message directly or forwarded (e.g. messages by letter), they enter the message manually into the DHL Incident Reporting System.

2. The DHL Incident Reporting System receives the message entered by the reporting party or a user and stores it on the server.
3. Notification of the existence of a new Report without further information on the facts of the case is automatically sent by e-mail to the person responsible for the Report. In order to ensure the highest possible level of confidentiality, the system assigns the Reports to the responsible Report Examiners from BUCO or the HuRICC organization on the basis of the triggering event or complaint subject selected by the reporting party. In the case of an anonymous mailbox set up by the Reporter, the Reporter uses this functionality to send a confirmation of receipt<sup>3</sup> to the Reporter. In the case of manually entered Reports, an appropriate alternative communication channel for acknowledgement of receipt shall be selected (usually email or telephone). The response or a note of a response given outside the system is stored in the DHL Incident Reporting System by the message processor. A response to received messages is given within 7 days.
4. If a plausibility check in accordance with the processes of Report and Case Management reveals an initial suspicion of at least one violation of guidelines, assuming that the facts presented in the notification are true, the notification processor creates a case for the clarification of the facts in the Case Management System and ensures that the role of the Case Manager is assumed by the notification processor himself or by colleagues from the responsible BUCO or HuRICC organization. Messages that obviously refer to a matter that has already been created as a case are assigned to the already existing matter by the message processor. The processors already assigned to a case receive a notification that there is another message with possibly additional information on the subject matter. After the plausibility check, messages that are identified as being without any doubt irrelevant are closed with a corresponding note.
5. The Case Manager checks the facts of the case. The Case Manager can ask any questions about the facts of the case via the communication channel established under 3. if applicable. The Case Manager selects the responsible Investigator(s) suitable for the individual case (usually Compliance, Internal Audit, Security, Legal or Human Resources). The role of Case

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<sup>3</sup> The Confirmation of Receipt can eventually contain a necessary discussion of the matter.

Manager and investigator is not performed in personnel union. The forwarding of the report or case to the investigator(s) is done on a case-by-case basis by providing personal access to the Report stored in the DHL Incident Reporting System, initiated by the Case Manager. Other third parties who go beyond the direct investigators of a case and are absolutely necessary on a case-by-case basis to support a clarification of the facts (e.g. accounting, purchasing, etc.) do not receive access to the entire case, but are included on partial aspects according to the necessity principle and do not receive access to the case file.

6. The investigator shall prepare an investigation report on the completion of the examination in the system and via necessary attachments to the evidence and make it available to the caseworker via the casework system using his/her individual case-related access.
7. The Case Manager reviews the investigation result, evaluates and closes the individual case. He/she then notifies the Reporter(s) in accordance with the standards of notification and case management. Feedback is usually provided within 90 days. In individual cases, further necessary notifications to third parties, such as the management of the department affected by an investigation, are to be made with the greatest possible confidentiality and in compliance with applicable data protection regulations.

## **§ 5 Protection of Reporters**

- (1) In the internal review of Reports submitted by employees or external parties, DHL shall ensure in particular that
  - i. the group of persons included is kept as small as possible
  - ii. when selecting the methods used, preference is always given to those methods which interfere least intensively with the personal rights of the accused and which best guarantee the principles of data protection
  - iii. the methods used are not disproportionate to the accusation made
  - iv. the accused are heard on the allegations in connection with the initiation of measures under labor or disciplinary law;
  - v. the regulations in force in the individual companies, in particular those relating to technical equipment or security issues, are complied with
  - vi. different treatment of accused persons on the basis of the criteria set out in § 75 (1) of the Works Council Constitution Act (BetrVG) or on the basis of hierarchical position in the Group companies is avoided; and
  - vii. banking secrecy is maintained.
- (2) Officials of the DHL who do not wish to submit a Report anonymously shall be made aware of any rights and obligations arising from their civil service relationship that may be affected.
- (3) Reporting parties who in good faith report information on non-compliance with the Code of Conduct or the more extensive guidelines mentioned therein, in particular the Supplier Code of Conduct and the Human Rights Policy Statement, will not be discriminated against. Reports of any violations will be treated confidentially. However, information about the identity of the Reporter may be disclosed to persons involved in official investigations or subsequent legal proceedings.
- (4) The accessibility of the DHL Incident Reporting System is certified by the manufacturer and the use of the corresponding functions is ensured. The DHL Incident Reporting System is available to whistleblowers and complainants in over 40 languages.

(5) The data protection notices of the DHL Incident Reporting System on the start page of the system provide information on reporting parties' rights to information and disclosure.

## **§ 6 Access Rights**

Access to the messages stored in the DHL Incident Reporting System is only permitted within the framework of a strict authorization and user concept.

## **§ 7 Rights of the Employee Representations**

- (1) The process is internally governed by a Group Works Council Agreement.
- (2) Every year, the DHL Group Works Council shall receive a report on DHL Incident Management based on statistical documents. In particular, the number of Reports received by the DHL Incident Reporting System as well as their channel of receipt and status shall be presented.
- (3) The Group Works Council shall be entitled to contact the GCO at any time and to be shown all functionalities on the system in order to be able to verify correct compliance with the provisions of the Group Works Council Agreement.
- (4) Existing participation rights of local works councils shall remain unaffected.

## **§ 8 Data Protection**

- (1) The DHL Group shall ensure that the data protection provisions of the BDSG and the EU-DSGVO are complied with.
- (2) Personal data shall only be collected to the extent that it is necessary for the operation and use of the procedure.

## **§ 9 Final remarks**

- (1) These procedural rules are based on concluded group company agreements and process standards in the DHL Group.
- (2) The Rules of Procedure are purely informative for reporting parties. The validity of Group company agreements, process standards and guidelines for reports by employees of the DHL Group shall remain unaffected by these Rules of Procedure.
- (3) The above relates to the central DHL Incident Reporting System of the DHL Group. National laws might require additional local reporting channels. Such local laws might require a handling within the entity hosting the local channel. DHL Group is legally not allowed to provide a general guidance on the question whether the DHL Incident Reporting System or a local reporting channel should be used for submitting reports.