

# **Rules of Procedure of KIT for Reporting Violations of Obligations to Protect Human Rights or the Environment According to the Act on Corporate Due Diligence Obligations in Supply Chains (Supply Chain Act, LkSG)**

**In any case of doubt or conflict the German Version always prevails**

Effective as of: January 01, 2024

## **Preamble**

It is the goal of Karlsruhe Institute of Technology (KIT) as "The University in the Helmholtz Association" to contribute to solving great challenges facing the society, economy, and environment by research, academic education, and innovation in a work environment characterized by diversity.

This goal results in a special responsibility of KIT towards society.

Compliance with laws, collective agreements, and regulations, securing scientific honesty, and observation of ethical standards as outlined in KIT's Guidelines for Ethical Principles are the basis of the responsible acting of KIT and its members and staff. This also includes the respect of human rights and ecological needs as well as the protection of the environment.

KIT places trust in its members and staff and expects them to comply with regulations and laws when working or acting for KIT. Here, executives and the management staff have a model function. Violations of legal and other regulations valid for KIT will not be tolerated.

KIT also expects its suppliers in the supply chain to observe the valid legislation and in particular the valid human rights and environmental protection provisions as well as the budgetary and contracting regulations.

The present rules of procedure apply to KIT's complaint procedure for reporting indications of risks to human rights and environmental protection as well as of violations of obligations to protect human rights or the environment according to the Supply Chain Act (LkSG).

## **1. Applicability**

The present rules of procedure apply to the reporting of indications of risks to human rights and environmental protection, of indications of violations of obligations to protect human rights or the environment at KIT, and of indications of such risks and violations at KIT's direct and indirect suppliers.

Any person or organization obtaining knowledge of a potential violation of obligations to protect human rights or the environment by KIT, its members, and staff or by direct or indirect suppliers of KIT or of the corresponding risks can report these to KIT via the channels specified below.

## 2. Reporting Channels

Indications as specified in Article 1 can be reported via the following channels:

1. By phone to +49(0)721 608-24636, by mail to [info@comp.kit.edu](mailto:info@comp.kit.edu), or personally after having made an appointment via the phone number or mail address given above.
2. Anonymously via the electronic whistleblower portal of KIT at <https://hinweis.comp.kit.edu/index.php?language=eng>.

## 3. Handling of Reports

- (1) Receipt of the report will be confirmed in writing to the reporter within a period of seven days depending on which channel and contact option was chosen. The report will be documented.
- (2) In case a risk or potential violation at KIT is reported, the Compliance Staff Unit or another responsible unit<sup>1</sup> will handle the process in accordance with the Supply Chain Act. The KIT unit in charge will depend on the scope of responsibility.
- (3) In case a risk or potential violation at a supplier is reported, this report will be forwarded promptly to the responsible unit.
- (4) If it is possible to contact the reporting person, the responsible unit of KIT will discuss the matter and open questions with the reporting person.
- (5) In case of concrete and reproducible indications of a risk to human rights or environmental protection or a corresponding violation at KIT or its suppliers, the matter will be pursued promptly. Depending on the individual case, follow-up measures will be taken. This may be e.g. the initiation of an internal examination, a procedure for friendly settlement or, in case of violations in the supply chain, conversations with or audits of suppliers. If a violation by KIT is found, it will be stopped immediately and appropriate measures will be taken to prevent future violations of this type (e.g. process optimization or taking of personnel-related measures).
- (6) If contact is possible, the reporting person will be informed by the unit on the status or outcome of the procedure. Doing this, legal requirements will be observed, in particular the rights of persons affected by the report.
- (7) The documentation of the report will be deleted three years upon completion of the procedure, unless longer documentation is required by law.

---

<sup>1</sup> For example, the Safety and Environment Business Unit (DE SUM), the Purchasing, Sales, and Materials Management Staff Unit (DE EVM), the Human Resources Business Unit (DE PSE), or the Legal Affairs Business Unit (DE RECHT).

#### **4. General Principles**

##### **(1) Protection of the reporting person**

KIT and all units investigating a report must ensure that the reporting person will not experience any disadvantages as a result of the report. Any disadvantage of reporting persons, such as intimidations or negative disciplinary actions as a result of the report, are forbidden and will not be tolerated.

Only a verifiably deliberately incorrect report by the reporting person (e.g. to wrongly blame persons) may have negative consequences for the former.

##### **(2) Confidentiality**

The units responsible for handling the reports will treat the information reported confidentially in principle. This especially applies to personal data. The identity of the reporting persons will only be disclosed, if the respective approval has been given and if this is permitted by law. Legal or administrative reporting obligations are excluded. The provisions specified in Articles 8 and 9 of the Whistleblower Protection Act (Hinweisgeberschutzgesetz) apply.

##### **(3) Protection of personal data**

When processing reports, legal requirements for the protection of personal data always have to be observed. In particular, the basic principles of purpose, proportionality, and data economy must be complied with.

The data collected and stored while processing a report have to be protected against unauthorized access. The same holds for documents forwarded to other offices, if they allow conclusions to be drawn with respect to individual persons.

#### **5. Announcement of the Present Rules of Procedure**

The present rules of procedure must be announced to all employees in an appropriate way (e.g. by circular letter or publication on the Intranet) as well as on KIT's Internet.

#### **6. Entry into Force**

The present rules of procedure enter into force on January 01, 2024.

Karlsruhe, January 01, 2024

Michael Ganß

Vice President Finance, Human Resources, and Infrastructure