

# OLYMPUS



**Complaints Procedure according to  
§ 8 of the Supply Chain Due Diligence Act (LkSG)**

01. January 2024



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# 1 Scope

The Act on Corporate Due Diligence Obligations in Supply Chains (Supply Chain Due Diligence Act – LkSG) entered into force on January 1, 2023, and is to be implemented on January 1, 2024 within Olympus Winter & Ibe GmbH (hereinafter: „Olympus“) and its affiliated companies as defined under § 2, para. 6, sentence 3 LkSG.

This document outlines the procedure for handling complaints in accordance with § 8 LkSG by Olympus. The Complaints Procedure is designed to allow individuals to report

potential human rights and environmental risks (see [Appendix 1](#)) or related violations resulting from the business activities in their respective areas of responsibility<sup>1</sup> or the actions of direct or indirect suppliers.



<sup>1</sup>Olympus Winter & Ibe GmbH's own business area includes affiliated companies as defined under § 2, para. 6, sentence 3 LkSG, on which Olympus Winter & Ibe GmbH has "decisive influence".

# General Provisions 2

§ Olympus assumes responsibility for upholding and promoting internationally recognized human rights within its own business area and through appropriate supply chain management. Within the scope of our business operations, we place particular importance on respecting human rights and environmental conservation. This includes ensuring fair, safe, and healthy working conditions within our global supply chain.

An essential core element of the due diligence obligations established in the LkSG is the establishment of an effective Complaints Procedure for reporting risks or violations pertaining to human rights and/or environmental protection (see [Appendix 1](#)). According to §§ 8 and 9 LkSG, every company must have an appropriate Complaints Procedure through which internal and external individuals can

report these risks or violations within the company's own business sector and supply chain.

Olympus has established such a Complaints Procedure as a core element of its efforts to ensure compliance with human rights and environmental due diligence obligations as defined by the LkSG.

This document provides information on the essential features of the Complaints Procedure, access to the process detailed in the following and its accessibility, as well as Olympus' responsibilities. It also outlines how incoming reports and complaints are managed, i.e., how the Complaints Procedure is executed.

### 3 Purpose of the Complaints Procedure

The Complaints Procedure is designed to provide every individual or group of individuals with the opportunity to submit relevant complaints or reports to Olympus, thereby raising awareness about human rights and environmental risks (see [Appendix 1](#)).

violations, allowing for the immediate prevention or mitigation of damages.



Individuals or groups of individuals also have the opportunity to report suspicions of legal

### Who is empowered to submit reports or file complaints?

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All Olympus employees as well as external individuals can submit complaints or reports, regardless of whether the submission is made domestically or internationally.

### 5 Through which channels can information and complaints be submitted?

Complaints and reports can be submitted at any time in three ways:



oste-compl-humanrights@olympus.com



+49 40 66966 1999

This telephone line leads to an automated message recording device (either English or German)



Olympus Winter & Ibe GmbH  
LkSG Beschwerdestelle  
Kuehnstraße 61  
22045 Hamburg  
Germany

All of these channels ensure that incoming reports are treated confidentially. For the specific process see section [„9.“](#).

## 6 Which incidents can be reported?



The Complaints Procedure is intended for reporting indications of human rights and environmental risks and/or violations as defined under § 2, para. 2 and 3 LkSG (see [Appendix 1](#)), arising from the business activities within Olympus' own areas of business or those of a supplier.

Only reports and complaints that - in the opinion of the complainant - are true should be reported. Complaints based on false factual claims or solely aimed at discrediting individuals


or companies, or those made for any other reason, constitute an abuse of the Complaints Procedure and are not considered complaints.


Knowingly providing false or misleading information is prohibited and punishable by law.

## 7 What information should I provide?

In order to facilitate a thorough and proper handling of the report or complaint, the complainant should provide information which is as detailed as possible.

To ensure an adequate follow-up, a submission should, at a minimum, include the following information:









Where did the incident happen?

When did the incident happen?

Which supplier is involved?

Description of potential concerns (see under „6.“ and [Appendix 1](#))

Can the complainant be contacted directly?

- If so, what is the preferred method of communication?
- If the complainant prefers contact by phone, when can they be reached?

**At least two** options should be provided.

## 8 Is it possible to submit reports and complaints anonymously?



When reporting concerns, the complainant has the option of remaining anonymous. Please note that anonymity cannot be maintained once a name has been provided. Ultimately, the description of the situation provided by the complainant may allow the number of people in question to be narrowed down to such an extent that anonymity can no longer be maintained.

The complainant should be aware that continued dialogue often facilitates or even enables the clarification of the situation. Therefore, the complainants are encouraged to remain in contact with the LkSG Complaint Office after their initial report.

In the event of concerns that, due to the con-

tent of the report and the information provided therein, conclusions about the identity of the complainant could be drawn, the complainant is encouraged to make these concerns known to the LkSG Complaint Office.

It should also be noted that the disclosure of the complainant's identity to notified parties may be required in the event that the complainant identifies themselves.

If the complainant has provided their name but does not wish the accused individual or group to learn their identity through the subsequent investigative activities, this should be clearly stated in the initial report. Such requests will be taken into consideration to the extent permitted by law.



## How does the Complaints Procedure work? 9

Olympus has established a central department within the Governance, Risk & Compliance (GRC) function for the processing and review of reports (referred to in this document as „LkSG Complaint Office“).

The Complaint Officer appointed by Olympus is part of the established LkSG Complaint Office.

Complaints and reports are managed by selected and appropriately trained employees within the GRC function. All employees responsible for overseeing these matters possess the following attributes.

They are:

- » impartial
- » independent in the context of processing and not bound by instructions
- » obliged to maintain confidentiality (even after the proceedings have been concluded)
- » appropriately trained
- » equipped with sufficient time resources

The Complaints Procedure shall commence upon receipt of a complaint or notice concerning one of the persons referred to in „5.“ complaint channels.

This acknowledgment is provided promptly, typically within one week, provided the necessary contact information from the complainant has been received.

Once a complaint or report has been received, it is internally documented, and the complainant receives an acknowledgment of receipt.



Throughout the entire procedure, the LkSG Complaint Office maintains contact with the complainant (via telephone, email, video conferencing, or even in-person meetings) if desired and according to the contact options available. This serves the purpose of efficiently and effectively clarifying the situation.

This examination also includes an assessment of which company or supplier is affected by the report.

The LkSG Complaint Office then assesses whether there is sufficient information to review and investigate the reported situation. If there is insufficient information, and if feasible, the LkSG Complaint Office will contact the complainant to request additional details. In the event that neither sufficient details can be ascertained nor contact with the complainant established, the case will be closed.



The complaints or reports are initially examined to determine the extent to which the reported situation constitutes a human rights or

environmental risk, or a violation of human rights or environmental obligations as defined by the LkSG (see [Appendix 1](#)) and compel Olympus to act in accordance with **§ 3, para. 2 LkSG**.



The LkSG Complaint Office conducts a comprehensive investigation of the situation while adhering to the principles of confidentiality and data protection.

If necessary, employees from the global GRC function at the local level may be consulted, ensuring that the principles outlined in „9.“ are upheld accordingly.

If required and insofar as feasible, the LkSG Complaint Office will discuss the matter with the complainant and may request further information. Additionally, the accused individual

or group is given the opportunity to provide their perspective. Where necessary, information may also be forwarded to the relevant authorities.



For the purposes of clarifying the situation, the LkSG Complaint Office may question available witnesses or other relevant informants and evaluate any other available evidence it deems relevant.

or environmental obligations (see [Appendix 1](#)) in its own business sector and among its suppliers, or that there is no need to take action in accordance with **§ 3, para. 2 LkSG**, the case will be closed.

If, after conducting the investigation, discussion, and examination, the LkSG Complaint Office is convinced that there are no human rights or environmental risks or violations of human rights



If, in the considered opinion of the LkSG Complaint Office, the investigation confirms human rights or environmental risks or violations of human rights or environmental obligations (see [Appendix 1](#)) in its own business sector and by or among suppliers in accordance with **§ 3, para. 2 LkSG**, the LkSG Complaint Office will develop a proposal for further action (especially prevention and remedial measures) based on the findings.

The complainant will be informed of the conclusion of the examination, provided that contact is possible.

However, for data protection reasons and depending on the nature of the case, the LkSG Complaint Office may not always be able to disclose the details of the findings and the measures taken to the complainant, in accordance with other legal requirements.

If, during the investigation, it is determined that a violation of human rights and/or environmental obligations is imminent or already occurring, immediate remedial measures will be initiated.

The timescale for processing is highly case-dependent and can therefore range from a few days to several months. However, the LkSG Complaint Office endeavors to conduct the examination swiftly and conclude it promptly.

Insofar as it is possible and reasonable, the complainant shall engage in this process. The implementation of the proposed solution, including any remedial measures, will be monitored by the LkSG Complaint Office.





The effectiveness of the Complaints Procedure is reviewed annually and on an ad hoc basis. If necessary, adjustments will be made and/or corrective measures taken.

Procedure are not capable of establishing subjective, enforceable legal positions of individuals.

The respective contents of this Complaints

## 10 Protection of Complainants

The protection of complainants from discrimination or punishment due to complaints or reports submitted is an important part of the Complaints Procedure.

The following measures are in place to protect complainants:



All complaints and reports are only processed by a small group of selected and appropriately trained employees („LkSG Complaint Office“).



All information, such as personal data and information that allows conclusions to be drawn about the identity of the complainants will be treated confidentially. The persons entrusted with the Complaints Procedure are obliged to maintain confidentiality. This also applies after the conclusion of the examination.



In accordance with legal requirements, the company's internal documentation is stored for seven years and then destroyed.



Olympus protects complainants from discrimination or punishment as a result of a complaint or report. Retaliation against anyone who has reported information in good faith is strictly prohibited. Should the complainant have reason to believe that they are being subjected to retaliatory measures, they should inform the LkSG Complaint Office immediately so that appropriate action can be pursued.

## Appendix 1 - Human rights and environmental risks

### Human rights risks

A human rights risk is a condition in which, based on factual circumstances, there is a reasonable likelihood of a violation of one of the following prohibitions:

1. Prohibition of child labor  
– § 2 para. 2 nos. 1 and 2 LkSG
2. Prohibition of forced labor and all forms of slavery  
– § 2 para. 2 nos. 3 and 4 LkSG
3. Prohibition of disregard for occupational health and safety and work-related health hazards  
– § 2 para. 2 no. 5 LkSG
4. Prohibition of disregard for freedom of association – Freedom of association and right to collective bargaining  
– § 2 para. 2 no. 6 LkSG
5. Prohibition of unequal treatment in employment  
– § 2 para. 2 no. 7 LkSG
6. Prohibition of withholding an adequate wage  
– § 2 para. 2 no. 8 LkSG
7. Prohibition of the destruction of natural resources by environmental pollution  
– § 2 para. 2 no. 9 LkSG
8. Prohibition of unlawful infringement of land rights  
– § 2 para. 2 no. 10 LkSG
9. Prohibition of the commissioning or use of private/public security forces which may lead to impairments due to a lack of instruction or control  
– § 2 para. 2 no. 11 LkSG
10. The prohibition of a [...] act or omission in breach of duty which is directly capable of impairing a protected legal position (which results from human rights treaties as defined under § 2 (1)) in a particularly serious manner and the illegality of which is obvious on a reasonable assessment of all relevant circumstances  
– § 2 para. 2 no. 12 LkSG



## Environmental risks



An environmental risk is a condition in which, on the basis of factual circumstances, there is a reasonable likelihood of a violation of one of the following prohibitions:

- 1 Prohibited production, use and/or disposal of mercury (Minamata Convention)  
– § 2 para. 3 nos. 1 to 3 LkSG
- 2 Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs  
– § 2 para. 3 nos. 4 and 5 LkSG
- 3 Prohibited import/export of hazardous waste as defined under the Basel Convention  
– § 2 para. 3 nos. 6 to 8 LkSG