

**Rules of procedure for the
complaints procedure
pursuant to section 8 of the German
Supply Chain Due Diligence Act
(LkSG)**

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Contact

COMPLIANCE DEPARTMENT

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I. Introduction

Arcadis Germany GmbH and its subsidiaries and parent companies are committed to respecting human rights and protecting the environment. It is the declared aim of the company management to respect, protect and promote human rights and environmental standards along the entire supply chain. Violations of internationally recognised human rights and national and international environmental protection regulations are not tolerated. Arcadis Germany GmbH takes appropriate and effective measures to identify and verify human rights and environmental risks in its own business area and in the entire supply chain and to prevent the realisation of risks. The human rights and environmental due diligence obligations include the establishment of an effective complaints procedure through which whistleblowers can report violations, risks, and other issues.

These rules of procedure explain the process of submitting and processing incoming complaints. It sets out how the complaints procedure can be used, who is responsible for the complaints procedure, what the specific process looks like once a complaint has been received, and what measures are taken to protect whistleblowers. The aim of the complaints procedure is to enable whistleblowers to contact us easily and safely so that human rights and environmental risks and violations in the supply chain can be identified at an early stage and any violations that have occurred can be minimised and eliminated.

In order to implement the new legal requirements in Germany, we operate a digital whistleblower system for Arcadis Germany GmbH in Germany. The digital whistleblower system is integrated into the Arcadis Germany website and is an internal company reporting centre in accordance with the legal requirements. The digital whistleblower system enables confidential reporting of information – completely anonymously if desired – on the website. This whistleblowing system offers a simple, confidential, data protection-compliant and (if desired) anonymous reporting centre that is available 24/7 and in over 30 languages.

In addition to and independently of the complaints procedure, Arcadis Germany GmbH monitors compliance with due diligence obligations as part of an established risk management system, which is carried out for example by using a supply chain intelligence tool and a questionnaire-based review of our suppliers.

II. Users of the complaints procedure

The complaints procedure is open to the public and is available to all persons, whether national or international. The complaints procedure can be used by both internal and external persons, including our Arcadis employees, employees of direct or indirect suppliers or residents around local activity sites. Both affected and unaffected persons can submit complaints.

III. Scope of application of the complaints procedure

The complaints procedure enables individuals to report human rights or environmental risks and violations that have arisen as a result of the business activities of Arcadis Germany GmbH and/or its subsidiaries or parent companies or in its supply chain. This applies to activities both in Germany and abroad. Notifications in accordance with the LkSG relate, among other things, to the following protected human and environmental rights: the prohibition of child labour, the prohibition of forced labour, the prohibition of slavery or slavery-like practices, occupational health and safety precautions, the prohibition of violations of the freedom of association, the prohibition of unequal treatment of employees, the prohibition of withholding an appropriate wage/minimum wage, the prohibition of causing harmful changes to soil, water pollution, air pollution, harmful noise pollution, or excessive water consumption, the prohibition of unlawful eviction and the unlawful deprivation of land, forests and water, the prohibition of the unlawful and inappropriate use of private or public security forces to protect a business project.

IV. Procedure

Regardless of which reporting channel is used to submit a complaint, the procedure upon receipt of the complaint is standardised.

1. Responsibility for the complaints procedure

Complaints are only received and processed by employees who act impartially, are obliged to maintain confidentiality and are not subject to any instructions within the framework of the complaints procedure.

2. Reporting channels for the submission of a complaint

In principle, there are different reporting channels available to whistleblowers:

- a) An internet-based reporting channel for verbal or written complaints, which can be accessed in several languages via the following link:
[https:// www.Arcadis.Reporting-Channel.com](https://www.Arcadis.Reporting-Channel.com).
- b) Postal information can be sent to the following address:

Compliance Department
Arcadis Germany GmbH
EUREF-Campus 10
10829 Berlin, Germany
e-mail: compliancegermany@arcadis.com

Reports can be submitted confidentially or anonymously. The processing status of a report submitted via the reporting channel can be tracked on the internet-based digital whistleblowing system.

3. Receipt of a complaint

Upon receipt of a complaint, the person making the complaint will receive a confirmation of receipt. The confirmation of receipt is usually sent immediately, although it may be delayed by up to two weeks.

If you have deliberately not submitted your report anonymously and with contact details, you will also be informed of the receipt of your report via the e-mail address you have provided and will be asked to confirm your e-mail address.

For anonymous complaints, login data will be created for you and automatically downloaded to the login area. You can then find these in your download folder. Please read the note on this carefully and then close the field by clicking the "OK" button. A confirmation of receipt and your login details will be displayed. You can save these via the link "Download access data".

In the case of a postal complaint, the confirmation of receipt will be sent within 2 weeks of receipt of the complaint.

4. Processing of the complaint

After receipt of the complaint, the information is reviewed centrally and assigned to a person in charge. Complaints relating to subsidiaries or parent companies of Arcadis Germany GmbH are forwarded to

the responsible person at the relevant subsidiary or parent company. The responsible officer maintains contact with the whistleblower, if necessary anonymously, via the digital whistleblower system, investigates the facts of the case and discusses them with the whistleblower if necessary. Complaints are taken into account as part of a risk analysis. If a violation of human rights or environmental obligations is identified, the responsible officer will immediately initiate corrective measures. If necessary, Arcadis Germany may offer the option of amicable dispute resolution. In case of a complaint regarding a human rights or environmental risk, without a violation having occurred, the responsible officer will initiate preventive measures. The results of the investigation are communicated to the whistleblower and, if necessary, further steps are discussed with them. The processing of complaints is usually finalised within three months of receipt. Arcadis endeavours to process complaints as quickly as possible, before this deadline, and to prioritise urgent complaints.

5. Anonymous submission of a complaint

In principle, complaints can be submitted anonymously. If a complaint is submitted anonymously, no data is collected that would allow conclusions to be drawn about the identity of the person submitting the complaint. If the person submitting a complaint anonymously provides information that allows conclusions to be drawn about their identity, the information will be treated confidentially.

6. Confidentiality of a complaint

When a complaint is submitted, the confidentiality of personal data and other information that allows conclusions to be drawn about the identity of the whistleblower is guaranteed. Only the person in charge and the person responsible for allocating the complaint can view a complaint.

7. Documentation of complaints

Information is stored for seven years in accordance with section 10(1) sentence 2 LkSG and then destroyed.

8. Step by step: Submitting a complaint via the digital whistleblowing system

You can submit a complaint via the reporting system through the following steps:

- a) Open the page arcadis.reporting-channel.com.
- b) To report human rights or environmental risks or violations, click on the button "Submit a report - Reports according to the Supply Chain Act".
- c) On the "**Information**" page, please read the "Information on reporting violations" carefully and then click on 'Continue'.
- d) Please enter the information about your report on the "**Create report**" page. These can also be recorded and sent as voice recordings.
- e) You can enter your contact details on the "**Your data (optional)**" page. This is voluntary information and not mandatory. If you wish to submit your complaint anonymously, you can of course do so, skip the details and simply click on "Continue".
- f) On the "**Declaration of consent**" page, please read the declaration of consent carefully and then check the box next to the declaration of consent and click "Continue". Please note that this field is mandatory for data protection reasons and must be checked so that your complaint, including anonymous complaints, can be processed.

- g) On the last page, "**Review & Send**", you can check all your details again. If you want to change your details, you can return to the previous pages using the "Back" button.
- h) Then please fill in the test field and submit your report using the "Send report" button.
- i) You can use the "Add to report" field to view the data of your report and also add further messages on the same matter.
- j) You can log out from the login area at the top right of the website.

9. Protective measures for whistleblowers

Arcadis Germany GmbH respects the protection of whistleblowers against discrimination or punishment on the basis of information and has taken the following measures to implement this protection:

- Complaints are handled by a small group of selected employees.
- Compliance officers receive regular training.
- Compliance officers sign confidentiality agreements.
- All information about the identity of the reporting person will be treated confidentially during and after the processing.
- Compliance officers are independent and not bound by instructions.

V. Entry into force / Publication

These Rules of Procedure enter into force on 01.01.2024. They will be published on the Arcadis Germany GmbH website.

About Arcadis

Arcadis is the leading global planning and consulting firm for the natural and man-made environment. By pooling local knowledge worldwide and combining our expertise with the latest digital achievements, we achieve outstanding and sustainable results for our clients and their customers. We are 36,000 people operating in more than 70 countries, generating revenues of €4.2 billion (based on pro forma figures for the full year 2021). We support UN Habitat with knowledge and expertise to improve the quality of life in fast-growing cities around the world.

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