



## Rules of procedure (status 2023/11/15)

to implement the "complaints procedure" in accordance with Law on corporate due diligence obligations in supply chains (Supply Chain Act LkSG)

as an industry solution for the member companies of the Wirtschaftsverband der deutschen Kautschukindustrie e.V. (wdk)

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These Rules of procedure are published at [www.wdk.de](http://www.wdk.de) on the homepage of the website of the German Rubber Industry Association in German, English and French.

### ➤ Area of application

These Rules of Procedure apply to all companies that are members of the Wirtschaftsverband der deutschen Kautschukindustrie, unless they have introduced their own complaints procedure in accordance with the LkSG.

The procedure includes all complaints about violations

- against human rights, in particular
  - Child labour,
  - Forced labour and slavery,
  - Disregard of local health and safety regulations,
  - Disregard for freedom of association,
  - Unequal treatment based on origin, ethnicity, gender, sexual orientation, age, religion, ideology or political opinion
  - Minimum wage provisions
  - Expropriation or deprivation of livelihood
- against environmental rights, in particular
  - harmful soil changes, water or air pollution, noise emissions and excessive water consumption

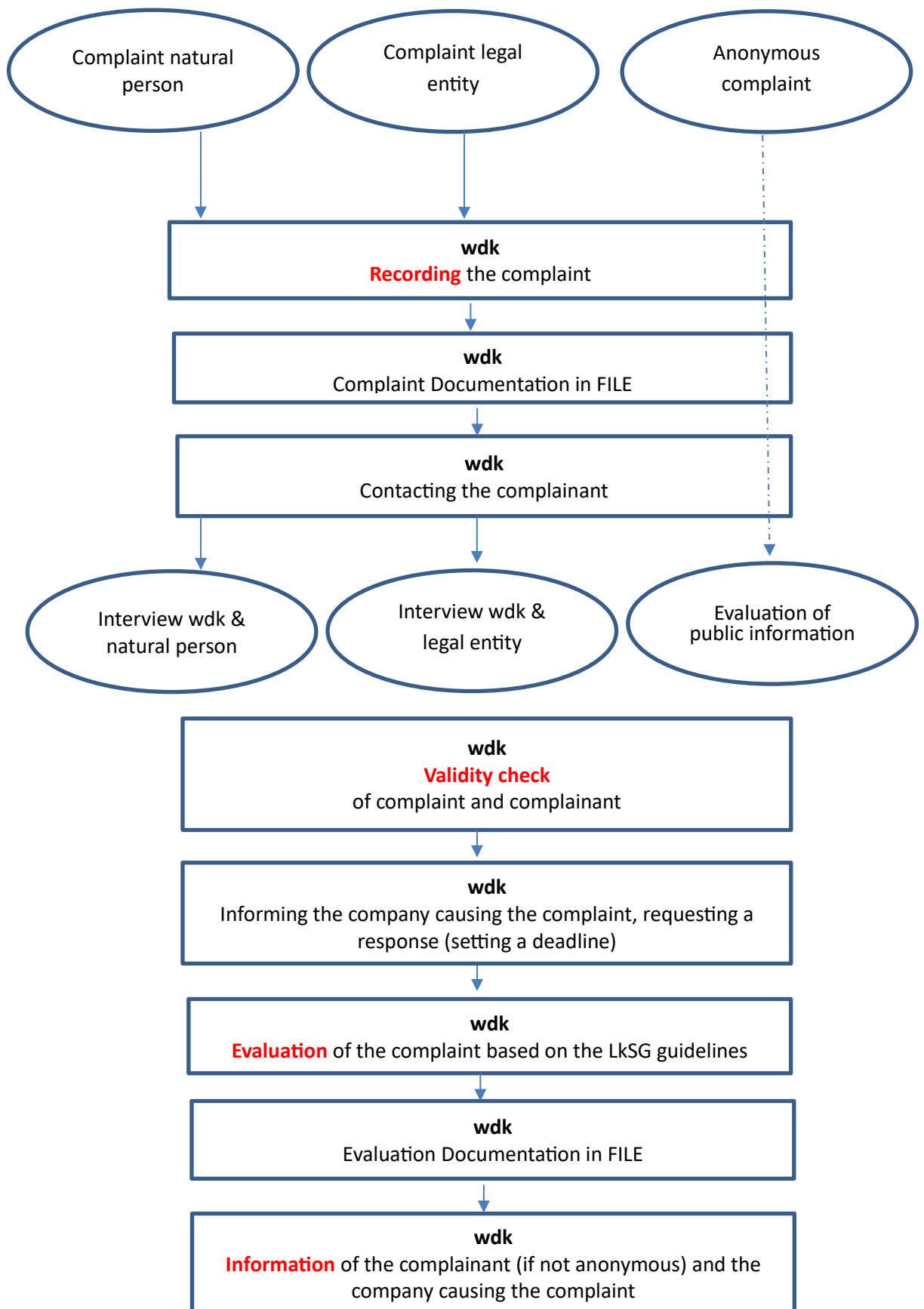
### ➤ Complaints channels

Your contact person is

- Dr Christoph Sokolowski, contactable via
  - Email: [c.sokolowski@wdk.de](mailto:c.sokolowski@wdk.de) (anytime)
  - Telephone: 0049 69 7936-137 (Voicemail Monday to Friday 9 a.m. to 6 p.m. CET)
  - Address: Wirtschaftsverband der deutschen Kautschukindustrie e.V.  
Supply chain officer  
Unter den Linden 26, 10117 Berlin, Germany

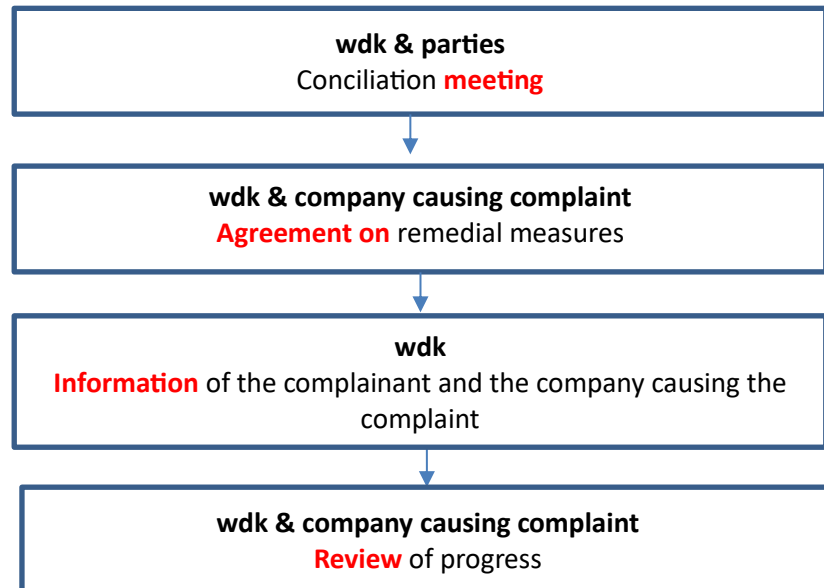
No costs are incurred by the contacting party (complainant). All costs of the procedure described here shall be borne by wdk.

➔ **Complaints procedure: recording, evaluation, feedback**



## ➤ Complaints procedure: amicable dispute resolution (optional)

Whether this optional procedure is used is decided by mutual agreement between the complainant and the company causing the complaint. In the event of an agreement, wdk assumes the function of an arbitrator without binding decision-making authority.



End of the complaints procedure.

## ➤ Contact persons during the complaints procedure

Your contact persons are

- Dr Christoph Sokolowski, contactable via  
Email : [c.sokolowski@wdk.de](mailto:c.sokolowski@wdk.de) (anytime)  
Telephone: 0049 69 7936-137 (Voicemail Monday to Friday 9 a.m. to 6 p.m. CET)  
Address: Wirtschaftsverband der deutschen Kautschukindustrie e.V.  
Supply chain officer  
Unter den Linden 26, 10117 Berlin, Germany
- Dr Veronika Beer, contactable via  
Email : [v.beer@wdk.de](mailto:v.beer@wdk.de) (anytime)  
Telephone: 0049 69 7936-144 (Voicemail Monday to Friday 9 a.m. to 6 p.m. CET)  
Address: Wirtschaftsverband der deutschen Kautschukindustrie e.V.  
Sustainability Officer  
Zeppelinallee 69, 60487 Frankfurt am Main, Germany

The persons named are and act independently and impartially towards complainants and towards the companies causing the complaint. With regard to the complaints procedure under the LkSG, they act in accordance with these rules of procedure and are not bound by instructions.

The persons named have relevant in-depth knowledge of supply chains in the rubber industry and of supply chain legislation. On behalf of the German rubber industry, they were involved in the development and political introduction of the German Supply Chain Act, including the legal organisation of the complaints procedure in accordance with the LkSG. They also support the

German industry in the political decision-making process for the European Supply Chain Act and the EU Deforestation Regulation.

➔ **Preservation of anonymity**

The procedure described above takes account of anonymous complaints. If a complainant who identifies themselves to the wdk requests anonymity, this will be granted. In all cases of anonymous complaints, the optional procedure for amicable dispute resolution is not applicable.

➔ **Validation and improvement**

This procedure is reviewed regularly - at least every three years - on the basis of the experience gained with the complaints procedure and updated if necessary.

Frankfurt am Main, 15 November 2023

signed Boris Engelhardt  
Secretary General  
Wirtschaftsverband der deutschen Kautschukindustrie e.V. (wdk)