

# Report on the Supply Chain Due Diligence Act (LkSG)

Reporting period from 1 October 2024 to 30 September 2025

**Name of the organisation:** Condor Flugdienst GmbH

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## Table of contents

A. Strategy & Integration	1
A1. Oversight of risk management & management's responsibility	1
A2. Policy Statement on the Human Rights Strategy	3
A3. Embedding the human rights strategy within the organisation	7
B. Risk analysis and preventive measures	9
B1. Implementation, procedure and results of the risk analysis	9
B2. Preventive measures within one's own business area	16
B3. Preventive measures at direct suppliers	19
B5. Communication of results	23
B6. Changes to risk exposure	24
C. Identification of non-conformities and corrective actions	25
C1. Identification of breaches and remedial measures within one's own area of responsibility	25
C2. Identification of violations and corrective measures at direct suppliers	26
C3. Identification of breaches and corrective measures at indirect suppliers	27
D. Complaints procedure	28
D1. Establishment of or participation in a complaints procedure	28
D2. Requirements for the appeal procedure	32
D3. Implementation of the complaints procedure	34
E. Review of risk management	35

## A. Strategy & Implementation

### A1. Oversight of risk management & management's responsibility

#### **What responsibilities for the monitoring of risk management were established during the reporting period?**

Condor has defined the internal responsibilities for overseeing risk management as follows:

- Condor appointed a Human Rights Officer on 1 January 2023.
- The Human Rights Officer is responsible within Condor for monitoring risk management in accordance with the LkSG.
- The Internal Audit & Risk Management department also reports to the Human Rights Officer. This ensures close integration of LkSG risk management with general risk management.

Condor has a risk management function within its Internal Audit & Risk Management department, which also takes human rights and environmental risks into account. This function also includes the role of Condor's Human Rights Officer, who is responsible for overseeing risk management and liaises with the various departments within the company with which there may be interfaces regarding human rights and environmental risks. This ensures that human rights and environmental risks are taken into account within all core business processes. Regularly involved are, for example, the Legal Department, which assists with the drafting of contract clauses, the Human Resources Department for labour law and personnel-specific issues, Central Procurement, and all specialist departments involved in procurement and purchasing processes. Responsibilities and organisational structures have proven effective since their establishment and will therefore be retained.

Furthermore, in his capacity as Human Rights Officer responsible for Internal Audit & Risk Management, he is a member of Condor's Risk Committee, which meets quarterly to discuss audit and risk management systems and also addresses human rights and environmental issues.

Furthermore, the Human Rights Officer is a permanent member of the Audit Committee of Condor's Supervisory Board and reports to this committee on a quarterly basis, in accordance with the agenda, on risk management (including human rights and environmental issues) as well as on the status of the implementation of the LkSG.

## A. Strategy & Implementation

### A1. Oversight of risk management & management's responsibility

**Has the management established a reporting process that ensures it is regularly – at least once a year – informed about the work of the person responsible for monitoring risk management?**

**It is confirmed that the management has established a reporting process which, within the meaning of Section 4(3) of the LkSG, ensures that it is regularly – at least once a year – informed about the work of the person responsible for overseeing risk management.**

- Confirmed

**Describe the process that ensures reporting to the management on risk management takes place at least once a year or on a regular basis.**

The Human Rights Officer reports directly to Condor's Chief Financial Officer (CFO), to whom he also reports on an ongoing basis, within the reporting structure, regarding human rights and environmental risks, any breaches of duty and the status of LkSG risk management.

In addition, the Human Rights Officer reports to Condor's Executive Board at least once a year (and on an ad hoc basis) as follows:

- Report on human rights and environmental risks and the status of risk management,
- Report on breaches of human rights and environmental obligations and related reports,
- Report on annual and ad hoc risk analyses,
- Results of inspections and audits,
- Report on the status of implementation of the LkSG, preventive measures and controls, including their further development,
- Discussion of the annual report to the supervisory authority,
- Presentation of the annual report on the work of the Human Rights Officer.

Furthermore, in his capacity as Human Rights Officer responsible for Internal Audit & Risk Management, he is a member of Condor's Risk Committee, which meets quarterly to discuss audit and risk management systems and also addresses human rights and environmental issues.

Furthermore, the Human Rights Officer is a permanent member of the Audit Committee of Condor's Supervisory Board and reports to this committee on a quarterly basis, in accordance with the agenda, on risk management (including human rights and environmental issues) as well as on the status of the implementation of the LkSG.

## A. Strategy & Implementation

### A2. Policy Statement on the Human Rights Strategy

**Is there a policy statement that has been drawn up or updated on the basis of the risk analysis carried out during the reporting period?**

The policy statement has been uploaded

German version:

[https://www.condor.com/de/fileadmin/m/pdf/Grundsatzzerklaerung\\_Menschenrechtsstrategie/  
Policy\\_Statement\\_25.11.2025\\_DE\\_clean.pdf](https://www.condor.com/de/fileadmin/m/pdf/Grundsatzzerklaerung_Menschenrechtsstrategie/Policy_Statement_25.11.2025_DE_clean.pdf)

English version:

[https://www.condor.com/eu/fileadmin/dam/pdf/Grundsatzzerklaerung\\_Menschenrechtsstrategie/  
e/Policy\\_Statement\\_25.11.2025\\_EN\\_clean.pdf](https://www.condor.com/eu/fileadmin/dam/pdf/Grundsatzzerklaerung_Menschenrechtsstrategie/Policy_Statement_25.11.2025_EN_clean.pdf)

Spanish version:

[https://www.condor.com/es/fileadmin/dam/pdf/Grundsatzzerklaerung\\_Menschenrechtsstrategie/  
/Policy\\_Statement\\_25.11.2025\\_ES\\_clean.pdf](https://www.condor.com/es/fileadmin/dam/pdf/Grundsatzzerklaerung_Menschenrechtsstrategie/Policy_Statement_25.11.2025_ES_clean.pdf)

## A. Strategy & Implementation

### A2. Policy Statement on the Human Rights Strategy

**Has the policy statement been communicated for the reporting period?**

**It is confirmed that the policy statement has been communicated to employees, the works council where applicable, the public and direct suppliers where a risk was identified during the risk analysis.**

- Confirmed

**Please describe how the policy statement was communicated to the relevant target groups.**

The publication of the policy statement was communicated within the Condor organisation via a newsletter. Furthermore, the policy statement is available not only to company employees but also to the public, rights holders, direct and indirect suppliers, and all other stakeholders via the company website in German, English and Spanish.

## A. Strategy & Implementation

### A2. Policy Statement on the Human Rights Strategy

#### **What elements does the policy statement contain?**

- Establishment of a risk management system
- Annual risk analysis
- Embedding of preventive measures within the company's own business area, among direct suppliers and, where applicable, indirect suppliers, and verification of their effectiveness
- Corrective measures within our own business unit, at direct suppliers and, where applicable, indirect suppliers, and verification of their effectiveness
- Establishment of a complaints procedure within one's own business area and among suppliers, and verification of its effectiveness
- Documentation and reporting obligations
- Description of the identified priority risks
- Description of human rights-related and environmental expectations of own employees and suppliers
- Further elements: Commitment to human rights and environmental protection

## A. Strategy & Implementation

### A2. Policy Statement on the Human Rights Strategy

**Description of any updates made during the reporting period and the reasons for them.**

The policy statement was updated in the 2024/2025 financial year. These updates are primarily due to changes in the area of environmental protection, as the risk situation has remained unchanged.

## A. Strategy & Embedding

### A3. Embedding the human rights strategy within the organisation

**In which key departments/business processes was the embedding of the human rights strategy ensured during the reporting period?**

- Personnel/HR
- Purchasing/Procurement
- CSR/Sustainability
- Legal/Compliance
- Internal Audit

**Describe how responsibility for implementing the strategy is distributed across the various departments/business processes.**

The Legal Department, which assists with drafting contract clauses, the HR Department for matters relating to employment law and personnel issues, Central Procurement, and all specialist departments involved in procurement and purchasing processes are regularly involved.

**Describe how the strategy is integrated into operational processes and procedures.**

Condor's own employees receive risk-based information and training on human rights and environmental protection. This also includes information and training on the expectations set out in the Policy Statement, the Code of Conduct for Employees and the Code of Ethics and Conduct for Business Partners.

The guidelines and processes mentioned are designed to implement the human rights strategy set out in the policy statement in areas where these intersect. This includes the development of procurement strategies and purchasing practices. The overall process places particular emphasis on the careful selection of suppliers as part of the procurement processes, as well as the structuring and monitoring of contractual relationships.

In addition, Condor participates in industry initiatives and forums that also address the issues of human rights and environmental protection.

The processes mentioned are continuously developed in collaboration with the relevant departments at Condor, and compliance with them is reviewed annually and on an ad hoc basis as part of the Internal Audit & Risk Management function.

**Please describe the resources and expertise made available for implementation.**

In addition to internal staff from the Compliance and Compliance Monitoring, Risk Management, Internal Audit, Sustainability and Procurement departments, external service providers are also utilised

as well as professional software solutions.

## B. Risk analysis and preventive measures

### B1. Implementation, procedure and results of the risk analysis

**Was a regular (annual) risk analysis carried out during the reporting period to identify, assess and prioritise human rights and environmental risks?**

- Yes, for our own business area
- Yes, for direct suppliers

**Please describe the period during which the annual risk analysis was carried out.**

The risk analysis covered the entire 2024/25 financial year.

**Please describe the risk analysis procedure.**

A system-based risk analysis was again carried out for the financial year under review. For the analysis of the supply chains, it was largely possible to draw on the results from previous years.

The system-based risk analysis was again carried out using the electronic system that had been implemented; the methodology for this is based on the following analytical steps of the software used:

First, an abstract, macroeconomic risk analysis is carried out with the aim of identifying country- and sector-specific risks. These risks can be mitigated by retrieving certificates, with only relevant and up-to-date certificates being taken into account. The application is linked to public databases and can therefore evaluate these certificates automatically. In addition, a microeconomic analysis is carried out, in which current media reports are reviewed to identify risks and specific violations of protected legal rights within the meaning of the LkSG in the company's own business area. The sources used for the media analysis are, on the one hand, GDELT, the world's largest and most comprehensive open database, and, on the other hand, the Business and Human Rights Resource Centre, which carries out an editorial assessment of the national and international media landscape based on human rights and environmental law. This is supplemented by the

Information from complaint channels, which also provides indications of risks and specific breaches of legal rights. To this end, an internal complaints procedure has been established within the company. Risk-based controls within the company's own business areas can also uncover risks and specific breaches. The indications identified through macroeconomic risk analysis, risk-based controls, media analysis and the complaints channels subsequently form the basis for defining preventive and remedial measures to minimise risks and put an end to specific infringements within the company's own business area.

## B. Risk analysis and preventive measures

### B1. Implementation, procedure and results of the risk analysis

**Were any ad hoc risk analyses carried out during the reporting period?**

- No

**Please explain your answer.**

No LkSG-relevant events were identified that would have required an event-specific risk analysis.

## **B. Risk analysis and preventive measures**

B1. Implementation, procedure and results of the risk analysis

### **Results of the risk assessment**

**What risks were identified within your own business area as part of the risk analysis(es)?**

- None

## B. Risk analysis and preventive measures

### B1. Implementation, procedure and results of the risk analysis

#### Results of the risk assessment

#### What risks were identified during the risk analysis(es) carried out at direct suppliers?

- Failure to comply with occupational health and safety regulations and work-related health hazards
- Failure to respect freedom of association – freedom of association and the right to collective bargaining
- Prohibition of unequal treatment in employment
- Prohibition of withholding fair wages
- Other prohibitions: The risks identified are, without exception, abstract risks. These arise because Condor also operates flights to countries that do not prioritise human rights risks in the same way, a situation over which Condor has no influence. However, the high level of regulation of air traffic in general, and of suppliers in particular, through very high internationally applicable standards and strict control mechanisms by authorities and participating companies, counteracts these risks.

## B. Risk analysis and preventive measures

### B1. Implementation, procedure and results of the risk analysis

**Were the risks identified during the reporting period weighted and, if applicable, prioritised, and if so, on the basis of which appropriateness criteria?**

- Yes, based on the expected severity of the violation according to degree, number of people affected and irreversibility
- Yes, based on our own ability to influence
- Yes, based on the likelihood of occurrence
- Yes, based on the nature and scope of one's own business activities
- Yes, based on the nature of the causal contribution
- Yes, based on other factors: for example, the potential accumulation of risks

**Please describe in more detail how the weighting and, where applicable, prioritisation were carried out and what considerations were taken into account.**

The weighting and prioritisation of the identified risks was carried out on the basis of the following appropriateness criterion(s).

The identified risk(s) was/were weighted and prioritised on the basis of the severity and reversibility of the injury(ies). The criteria used for this assessment include, in particular, the severity of the injury(ies), the number of people affected or the extent of the environmental impact, the irreversibility of the damage, and the effort required to remedy the negative effects.

The identified risk(s) was/were weighted and prioritised based on the company's ability to influence the business partner. The criteria used for this assessment include, in particular, the turnover generated from the business relationship, the importance of the business partner to the company, the intensity of the relationship with the business partner, and the management of business partners. The identified risk(s) was/were weighted and prioritised based on the probability of the breach(es). The criteria used for this assessment include, in particular, whether the risk(s) has/have already led to a breach in the past or whether effective preventive measures are already in place.

The identified risk(s) was/were weighted and prioritised on the basis of the nature and scope of the company's own business activities. The criteria used for this assessment include, in particular, the nature and type of products/services, the company's regional/international focus, and the question of any factors that may give rise to country-, sector- or product-group-specific risks.

The identified risk(s) was/were assessed on the basis of the contribution of the

weighted and prioritised according to the business partner's own company. The criterion used to assess the contribution to causation is the question of liability.

## B. Risk analysis and preventive measures

### B2. Preventive measures within our own business area

**Which risks were prioritised within the company's own business division during the reporting period?**

- None

**If no risks were selected, please explain your answer.**

No specific risks were identified in your own business area during the reporting period, which is why no prioritisation could be carried out.

## B. Risk analysis and preventive measures

### B2. Preventive measures within our own business area

**What preventive measures were implemented during the reporting period to prevent and minimise the priority risks within your own business area?**

- Conducting training in relevant business areas
- Other/additional measures: Drafting and issuing the policy statement on the human rights strategy; integrating the human rights strategy set out in the policy statement into business processes; developing and implementing procurement strategies and purchasing practices; developing control measures

#### Conducting training in relevant business areas

**Describe the measures implemented and specify in particular their scope (e.g. number, coverage/scope).**

All employees were informed and made aware of human rights and environmental issues on several occasions during the reporting period. Approximately 300 employees received target-group-specific training on LkSG topics and specific requirements.

**Describe the extent to which the training courses are appropriate and effective in preventing and minimising priority risks.**

Training participants were selected on a risk-based basis, i.e. according to their potential points of contact with human rights and environmental issues in connection with Condor's business activities, taking the risk assessment into account. Effectiveness will be reviewed through future control measures.

#### Other/additional measures

**Describe the measures implemented and specify, in particular, their scope (e.g. number, coverage/scope).**

For the policy statement and its implementation, see above.

Development of a guideline on procurement strategies and purchasing practices.

Development of a process for the selection and management of suppliers using the electronic system introduced.

**Describe the extent to which the measures to prevent and minimise priority risks are appropriate and effective.**

Condor's business operations are characterised by stringent regulation of air traffic, very high international standards and strict control mechanisms imposed by regulatory authorities and partner companies. This also reduces risks within the company's own business operations.

Nevertheless, Condor makes use of existing opportunities to exert influence, such as those set out in the

Procurement Strategies and Purchasing Practices and associated processes. All Condor employees are informed and made aware of these issues; those with responsibilities in procurement and purchasing are entrusted with further relevant tasks and receive comprehensive training and additional information in this regard. Involvement in information and training measures is risk-based, i.e. determined by potential points of contact with human rights and environmental issues in connection with Condor's business activities, taking into account the risk assessment. Effectiveness will be reviewed through future control measures.

## B. Risk analysis and preventive measures

### B3. Preventive measures at direct suppliers

**Which risks were prioritised for direct suppliers during the reporting period?**

- None

**If no risks have been identified, please explain your answer.**

As a general rule, abstract human rights and environmental risks arise in particular because Condor's flights also serve countries that do not prioritise human rights and environmental risks in the same way. No specific risks were identified among direct suppliers during the reporting period. The abstract risks were prioritised equally in order to derive preventive measures from them.

## B. Risk analysis and preventive measures

### B3. Preventive measures at direct suppliers

**What preventive measures were implemented during the reporting period to prevent and minimise the priority risks at direct suppliers?**

- Development and implementation of appropriate procurement strategies and purchasing practices
- Incorporating expectations into the supplier selection process
- Obtaining contractual assurances regarding compliance with and implementation of expectations throughout the supply chain
- Training and further education to ensure compliance with contractual assurances

#### **Other categories:**

Selected:

- Integration of expectations into supplier selection
- Obtaining contractual assurances regarding compliance with and implementation of expectations throughout the supply chain
- Training and further education to enforce contractual commitments

**Describe the extent to which the measures to prevent and minimise priority risks are appropriate and effective.**

Condor's business operations are characterised by stringent regulation of air traffic, very high international standards and strict control mechanisms implemented by regulatory authorities and partner companies. This applies to air traffic in general, but also to the requirements and controls imposed on suppliers, the vast majority of whom, for example, require specific certifications. This significantly reduces the risks associated with Condor's direct suppliers. Nevertheless, Condor has developed a number of specific measures to further reduce these risks, which are outlined below.

The selection of a suitable supplier and the conclusion of a contract with them is a key component of Condor's procurement and purchasing practices across all departments. The overall process places particular emphasis on the careful selection of suppliers within the procurement process, as well as the structuring and monitoring of the contractual relationship. This process includes the following elements in particular:

Suppliers are only considered as business partners if they meet the applicable legal and regulatory requirements. This process is supported by the use of an electronic system.

Suppliers are bound by written contracts (e.g. IATA standard contracts) on a risk-based basis.

Condor has a Code of Ethics and Conduct for Business Partners ("Code of Conduct")

which sets out in detail Condor’s expectations regarding compliance, including the fulfilment of human rights and environmental obligations, and sets out binding minimum standards for business conduct that we also expect from our business partners. Condor makes the Code of Conduct binding prior to entering into a business relationship with a supplier by contractually obliging the supplier to adhere to the Code of Conduct on a risk-based basis. This also includes requiring our business partners to comply with our stated standards and to implement the same within their supply chain.

Before a contract is concluded, suppliers receive risk-based, tailored information regarding our expectations regarding compliance with applicable laws and other legal requirements, the importance of human rights and environmental obligations, the options for reporting compliance concerns (including human rights and environmental issues) to our reporting office or other listed contacts, training materials, and guidance on passing on the obligations imposed on them to their suppliers (where applicable).

Suppliers subject to aviation regulations are subject to risk-based audits by the Compliance Monitoring department; other suppliers are subject to risk-based audits by other functions (including Internal Audit).

All Condor employees are informed and made aware of these issues; those with responsibilities in procurement and purchasing are entrusted with additional relevant tasks and receive comprehensive training and further information in this regard. Involvement in information and training measures is risk-based, i.e. determined by potential points of contact with human rights and environmental issues in connection with Condor’s business activities, taking into account the risk assessment. Effectiveness will be reviewed through future monitoring measures.

#### **Category: Procurement Strategy & Purchasing Practices**

Selected:

- Development and implementation of appropriate procurement strategies and purchasing practices

#### **Describe the measures implemented and to what extent the setting of delivery times, purchase prices or the duration of contractual relationships has been adjusted.**

Development and implementation of a policy on “Procurement Strategies and Purchasing Practices”. In addition, a system-supported process for the selection and management of suppliers was established to specifically assess suppliers against particular LkSG risks.

#### **Describe how adjustments to the company’s own procurement strategy and purchasing practices are intended to contribute to the prevention and minimisation of priority risks.**

The Procurement Strategies and Purchasing Practices Policy sets out the framework for how Condor can fulfil its responsibilities, particularly with regard to human rights and environmental issues, in order to prevent or minimise potential risks within its own business operations and among its suppliers. The policy is intended to

also aims to implement the human rights strategy set out in Condor's Policy Statement within the company's relevant business processes. In addition, a system-supported process has been established to specifically assess suppliers for particular LkSG risks.

## **B. Risk analysis and preventive measures**

### **B5. Communication of the results of the human rights due diligence ( )**

**Were the results of the risk analysis(es) for the reporting period communicated internally to relevant decision-makers?**

**It is confirmed that the results of the risk analysis(es) for the reporting period were communicated internally in accordance with Section 5(3) of the LkSG to the relevant decision-makers, such as the Board of Directors, the management or the procurement department.**

- Confirmed

## **B. Risk analysis and preventive measures**

### **B6. Changes to the risk profile**

**What changes have occurred with regard to priority risks compared with the previous reporting period?**

The risks presented for the 2024/25 reporting period have not changed in the current reporting period.

## C. Identification of non-conformities and corrective actions

Identification of breaches and remedial measures within the organisation's own business area

**Were any breaches identified within our own business area during the reporting period?**

- No

**Please describe the procedures used to identify breaches within your own business area.**

Complaints or reports of breaches can be submitted at any time via Condor's whistleblowing system ("Condor Safespace") – including anonymously. Condor also has a risk management system in place that can identify potential breaches.

Employees receive ongoing training on relevant topics relating to the LkSG, in particular occupational safety and health protection.

## C. Identification of non-conformities and corrective actions

Identification of breaches and remedial measures at direct suppliers

**Were any breaches identified among direct suppliers during the reporting period?**

- No

**Please describe the procedures used to identify breaches at direct suppliers.**

Reports of violations can be submitted via the established online whistleblowing portal (Condor SafeSpace) or a dedicated email address published on the internet. Violations may also be identified during audits. Furthermore, violations can be identified through the aforementioned monitoring and audit measures.

## C. Identification of non-conformities and corrective actions

Identification of violations and corrective measures at indirect suppliers

**Were any violations identified at indirect suppliers during the reporting period?**

- No

## D. Complaints procedure

### D1. Initiating or participating in an appeal procedure

**In what form was a complaints procedure offered during the reporting period?**

- Company-specific complaints procedure
- Further information: Condor Flugdienst GmbH and its subsidiaries (“Condor”) have established a reporting and complaints procedure, which also covers the internal complaints procedure relating to human rights and environmental risks and breaches of duty. This procedure can be accessed via <https://safespace.condor.com/>.

**Please describe your company’s own procedure and/or the procedure in which your company participates.**

Respect for human rights and protection of the environment are matters of great importance to us. Condor encourages everyone to report any risks or breaches of due diligence obligations they observe within the company’s supply chain relating to human rights and environmental issues. We have established a set of procedures for this purpose.

Condor has set up a whistleblowing system (“Condor SafeSpace”) through which company employees, as well as business partners and other third parties, can report potential breaches of laws and other legal requirements and principles, including issues relating to human rights and the environment. As a general rule, we treat such reports professionally, fairly and confidentially in accordance with legal provisions. Reports may be submitted either by name or anonymously.

Whistleblowers acting in good faith are protected from discrimination or punishment within the framework of legal provisions.

## D. Complaints procedure

### D1. Initiating or participating in an appeal procedure

#### Which parties have access to the complaints procedure?

- Our own employees
- Communities near our own sites
- Employees of suppliers
- External stakeholders such as NGOs, trade unions, etc.
- Others: The complaints procedure is open to anyone.

#### How is access to the complaints procedure ensured for the various groups of potential stakeholders?

- Publicly available rules of procedure in written form
- Information on accessibility
- Information on jurisdiction
- Information on the process
- All information is clear and understandable
- All information is publicly accessible

#### Publicly available rules of procedure in written form

##### Optional: Please describe.

The rules of procedure are available at [https://www.condor.com/de/fileadmin/dam/pdf/Verfahrensordnung\\_LkSG\\_Deutsch\\_12.12.2022.pdf](https://www.condor.com/de/fileadmin/dam/pdf/Verfahrensordnung_LkSG_Deutsch_12.12.2022.pdf). English and Spanish versions of the document are also available.

#### Information on accessibility

##### Optional: Please describe.

Contact details are also available on the company website.

#### Information on responsibility Optional:

##### Please describe.

-

**Information on the process**

**Optional: Describe.**

-

**All information is clear and understandable Optional:**

**Please describe.**

-

**All information is publicly available Optional: Please**

**describe.**

-

## D. Appeals procedure

### D1. Establishment of or participation in a complaints procedure

**Were the rules of procedure publicly available during the reporting period?**

File uploaded

**Regarding the rules of procedure:**

German version:

[https://www.condor.com/de/fileadmin/dam/pdf/Verfahrensordnung\\_LkSG\\_Deutsch\\_12.12.2022.pdf](https://www.condor.com/de/fileadmin/dam/pdf/Verfahrensordnung_LkSG_Deutsch_12.12.2022.pdf)

English version:

[https://www.condor.com/eu/fileadmin/dam/pdf/rules\\_of\\_procedure\\_lksg\\_englisch\\_20.09.2023.pdf](https://www.condor.com/eu/fileadmin/dam/pdf/rules_of_procedure_lksg_englisch_20.09.2023.pdf)

Spanish version:

[https://www.condor.com/es/fileadmin/dam/pdf/Reglamento\\_de\\_Procedimiento\\_lksg\\_spanisch\\_20.09.2023.pdf](https://www.condor.com/es/fileadmin/dam/pdf/Reglamento_de_Procedimiento_lksg_spanisch_20.09.2023.pdf)

## D. Appeals procedure

### D2. Requirements for the appeals procedure

**Please specify the person(s) responsible for the procedure and their role(s).**

The receipt and initial assessment of a whistleblower's report are primarily handled by the external confidential lawyer. However, complaints may also be addressed directly to the Human Rights Officer. If the report is deemed relevant and substantiated, further investigation and assessment are carried out by Legal & Compliance. The Compliance department, under the leadership of the Director of Legal & Compliance or the confidential lawyer, is responsible for handling and implementing the complaints procedure. The role of the Human Rights Officer in relation to the complaints procedure is primarily to monitor the measures taken.

**It is confirmed that the criteria set out in Section 8(3) of the LkSG regarding the competent authorities are met, i.e. that they offer a guarantee of impartiality, are independent and not bound by instructions, and are bound by a duty of confidentiality**

- Confirmed

## D. Appeals procedure

### D2. Requirements for the appeals procedure

**It is confirmed that, for the reporting period, measures were taken to protect potentially involved parties from disadvantage or punishment as a result of a complaint.**

- Confirmed

**Describe the measures taken, in particular how the complaints procedure ensures the confidentiality of whistleblowers' identities.**

The designated persons guarantee impartial action and are bound by confidentiality obligations under the relevant legal provisions. As a lawyer, the confidential advisor is additionally subject to statutory and professional confidentiality obligations.

The web-based whistleblowing system allows reports to be submitted anonymously. Should the whistleblower have disclosed their identity, this will be treated confidentially alongside the report, in accordance with legal provisions. Whistleblowers acting in good faith are protected from discrimination or punishment in accordance with legal provisions.

**Please describe the precautions that have been taken, in particular the additional measures in place to protect whistleblowers.**

Only data necessary for the technical provision of the service is collected. This data is stored on a dedicated drive to which only authorised personnel have access. The same applies to a dedicated email inbox through which feedback can be submitted.

When processing any reports and investigating the relevant facts, no details regarding the identity of the whistleblower are disclosed; instead, reference is made only to the "whistleblower". The identity of the whistleblower is disclosed only with their express permission.

## D. Appeals procedure

### D3. Implementation of the complaints procedure

**Were any reports received via the complaints procedure during the reporting period?**

- Yes

**Please provide further details on the number, content, duration and outcome of the procedures.**

During the reporting period, 13 reports were received via the complaints procedure, none of which were clearly relevant to the LkSG.

**What issues have complaints been received about?**

- Other human rights risks: General human rights situation

**Please describe the conclusions drawn from the complaints/reports received and to what extent these findings have led to adjustments in risk management.**

As the reports received were not specifically relevant to the LkSG, no conclusions or adjustments to risk management could be drawn from them.

## E. Review of risk management

**Is there a process in place to review the adequacy and effectiveness of risk management across the board?**

**In which of the following areas of risk management are adequacy and effectiveness assessed?**

- Resources & Expertise
- Risk analysis and prioritisation process
- Preventive measures
- Remedial measures
- Complaints procedure
- Documentation

**Describe how this assessment is carried out for the relevant area and what results it has yielded – particularly with regard to the prioritised risks.**

Designated contact persons and areas of responsibility have been identified within the relevant departments. Legal & Compliance and the Human Rights Officer are regularly informed of the current status. The adequacy and effectiveness of processes and measures are discussed and adjusted where necessary. This information is incorporated into the company's risk report. The procedures for preparing the regular risk report and the risk report itself are regularly discussed by the Executive Board and subsequently by the Supervisory Board committees. An audit of our risk management system forms part of the external audit of our annual financial statements by an audit firm.

All processes are also subject to risk-based control measures, in particular by Internal Audit.

## E. Review of risk management

**Are there processes or measures in place to ensure that, when establishing and implementing risk management, the interests of your employees, employees within your supply chains, and those who may be directly affected in a legally protected capacity by the commercial activities of your company or by the commercial activities of a company within your supply chains are given appropriate consideration?**

**In which areas of risk management are there processes or measures in place to take into account the interests of those potentially affected?**

- Resources & Expertise
- Preventive measures
- Remedial measures
- Complaints procedure

**Please describe the processes and measures in place for each area of risk management.**

As part of the implementation of the Supply Chain Due Diligence Act and the Whistleblower Protection Act, Condor has established a reporting system and procedure that can be used by employees. This has been agreed with the internal co-determination bodies. For external parties, this is done via the Condor website, on a risk-based basis through information packs, and via the Condor Code of Ethics and Conduct for Business Partners.

These reports would be addressed to the independent human rights officer or an external legal adviser. Furthermore, professional software solutions are used for risk analysis of existing and new suppliers.