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L.I.T. Aktiengesellschaft

Rules of Procedure for the Whistleblower and Complaints System of the L.I.T. Group

L.I.T. AG is committed worldwide to preventing adverse impacts on the observance of human rights within our business activities, to minimizing such impacts and, wherever possible, to bringing them to an end.

As a company, we are convinced that, as a globally active logistics service provider, we bear a high level of responsibility towards society as well as towards our partners, customers and employees.

In order to make an active contribution to a sustainable and fair global economy, economic success and social responsibility should go hand in hand. It is therefore part of our corporate culture to assume shared responsibility for sustainability along supply chains and international supply chains.

Our business activities are based on ethical and legal standards, ensuring that all actions taken on behalf of L.I.T. AG are consistent with our corporate philosophy and the values represented by the Group. These principles are set out in our Code of Conduct.

L.I.T. AG has established a central whistleblower and complaints system. Human rights and environmental risks as well as violations of human rights-related or environmental obligations within the meaning of the German Supply Chain Due Diligence Act (LkSG) can be reported through this system (in accordance with Section 2 (2) and (3) LkSG). The complaints procedure is accessible via the L.I.T. AG website and is referred to as the "Complaints Procedure". At the same time, the central system serves as an internal reporting channel under the German Whistleblower Protection Act (HinSchG) for the companies of the L.I.T. Group connected to the central reporting office. Violations covered by the HinSchG can be reported through this channel. The respective company remains responsible for any necessary follow-up measures within its area of responsibility.

We welcome all forms of feedback and take complaints received very seriously. They may contain important and valuable information and can provide input for positive developments. The complaints procedure therefore also serves as an early-warning system through which problems can be identified and, ideally, resolved in order to prevent human rights and environmental violations and avoid associated costs and reputational damage.

These Rules of Procedure describe how reports and complaints can be submitted, reviewed and processed. They apply to the complaints procedure under the LkSG as well as to reports under the HinSchG, provided that the respective company is connected to the central reporting office. They apply to employees of L.I.T. AG as well as persons performing work on its behalf, including subcontractors, temporary workers and agency workers.



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Who can provide a complaint?

The complaints procedure under the LkSG is open to all persons who wish to report human rights or environmental risks or corresponding violations of obligations within the company's own business area or along the supply chain. The internal reporting channel under the HinSchG is available to employees and agency workers of the connected companies. In addition, it may be used by persons who come into contact with a company of the L.I.T. Group in the course of their professional activities.

How can a complaint be given?

The L.I.T. AG complaints procedure is accessible via the website (<https://www.lit.de/beschwerdeformular/>). Employees can also access the complaints form via the intranet. Alternatively, complaints may be submitted by email to beschwerden@lit.de or by telephone. Upon request, a personal meeting with a responsible person from the reporting office can be arranged within a reasonable period of time. Reporting persons may alternatively contact a competent external reporting office. The general external reporting office of the Federal Government is established at the Federal Office of Justice.

How do we handle complaints?

- 1) The complaints procedure begins upon receipt of a complaint. The reporting person receives an acknowledgement of receipt within 7 days and, where necessary, follow-up questions regarding the circumstances of the case.
- 2) The complaint received is first reviewed for plausibility and to determine whether it falls within the scope of the complaints procedure. Once accepted, the complaint is forwarded to the responsible departments within L.I.T. AG.
- 3) Once the complaint has been accepted, objective and comprehensive clarification measures are carried out in accordance with legal and internal requirements and regulations and with due regard for the rights of all parties involved in the procedure. Service providers may be contacted to assist with the investigation, for example where documents need to be requested. L.I.T. AG may appoint third parties to conduct the investigation, provided that they are contractually or professionally obliged to act objectively and maintain confidentiality. The reporting office may offer a procedure for amicable settlement. Reporting persons are informed at least every three months about the status of their complaint, the next steps and the expected timeline. The reporting person may also request information on the status of the procedure through the channels used to submit the report.
- 4) Reporting persons are informed when the procedure has been completed and of its outcome.



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Confidentiality

Confidentiality is maintained throughout the entire procedure. This means that access to data that could directly or indirectly reveal the identity of the reporting person remains strictly restricted. The persons involved in reviewing and processing cases act independently. This means that they act impartially, make their decisions free from instructions and are not subject to any dependencies when handling cases. The relevant confidentiality and independence requirements have been discussed with and implemented for the persons involved.

Are reporting persons protected?

The reporting person can decide which data they wish to disclose when submitting a report. L.I.T. AG protects reporting persons by ensuring that

- 1) all complaints containing, for example, personal data or other information that could allow conclusions to be drawn about the identity of the reporting person are treated confidentially.
- 2) the responsible units handling complaints and reports consist only of a small group of independent employees who are obliged to maintain confidentiality.
- 3) reporting persons who raise concerns in good faith do not have to fear any disadvantageous measures and are protected by L.I.T. AG and the applicable laws.

Documentation

Incoming reports and their processing are documented while maintaining confidentiality. For reports under the HinSchG, the documentation is generally deleted three years after completion of the procedure, unless longer retention is necessary and proportionate. Other statutory retention obligations remain unaffected.

Effectiveness of the complaints procedure

The effectiveness of the complaints procedure is reviewed internally once a year or on an ad hoc basis where necessary. The review of effectiveness is carried out by the Human Rights Officers of L.I.T. AG.

Approval and entry into force

This public version was approved on 25 September 2026 and enters into force on 25 September 2026.

Zentrale

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Bitte beachten Sie die Haftungseinschränkungen sowie Abweichungen zum Gesetz (HGB) im Höchstbetrag gemäß ADSp 2017 Ziffer 22 bzw. 23. ff.