

# Rules of Procedure for the Complaints Procedure according to § 8 of the Supply Chain Due Diligence Act (LkSG) of the Amadeus FiRe Group

## I. Introduction

As a Group, Amadeus FiRe AG consists of the Personnel Services segment with the Amadeus FiRe brand and the Training segment with the main brands Comcave College, GFN and Steuerfachschule Dr. Endriss.



The Amadeus FiRe AG is dedicated to the respect of human rights and the protection of the environment. The management's declared aim is to respect, protect and promote human rights and the environment along the entire value chain. Violations against internationally established human rights and against national and international environmental protection

regulations are not tolerated. Amadeus FiRe AG implements reasonable and effective measures to identify and verify human rights and environmental risks in its own business operations and throughout the supply chain and to prevent the realisation of risks. Included in the human rights and environmental due diligence obligations is 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 handling incoming whistleblowing. It sets out how the complaints procedure can be accessed, who is responsible for the complaints procedure, how the specific process looks 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 the company 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.

## II. Addresses and scope of application of the complaints procedure

The complaints procedure is publicly accessible and available to all persons - whether in Germany or abroad. The complaints procedure enables persons to point out human rights or environmental risks as well as violations of human rights or environmental obligations that have occurred as a result of the economic activities of Amadeus FiRe AG and/or its companies or in the supply chain..

### III. Procedure

Independent of the reporting channel through which a notice is submitted, the procedure is standardised from the time of receipt of the notice.

#### 1. Competence for the complaints procedure

Only employees who act impartially, are obliged to maintain confidentiality without being subject to instructions within the framework of the complaints procedure are responsible for receiving and processing information. In order to ensure compliance with all legal requirements, we have set up a central organisation within the Group for the submission of reports and complaints. All incoming reports and information are processed centrally and independently of the company concerned.

Centrally responsible for our complaints procedure and primary contacts for questions or comments:

Amadeus FiRe AG

Jan Hendrik Wessling  
Phone: +49 69 69876-186  
E-Mail: [jwessling@amadeus-fire.de](mailto:jwessling@amadeus-fire.de)

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E-Mail: [fmarschall@amadeus-fire.de](mailto:fmarschall@amadeus-fire.de)

#### 2. Submitting a notice

Generally, different notification channels are available to whistleblowers:

- An internet-based reporting portal that can be accessed in several languages via the following link

[Amadeus FiRe AG](#)  
[Steuer-Fachschule Dr. Endriss GmbH](#)  
[Comcave College GmbH](#)  
[GFN GmbH](#)

- Notices can also be sent via the following communication channels

By mail to:  
Amadeus FiRe AG  
Investor Relations  
Hanauer Landstraße 160  
60314 Frankfurt am Main

By telephone at: 069 96876 – 180

By e-mail to: [ir@amadeus-fire.de](mailto:ir@amadeus-fire.de)

Notifications can be submitted confidentially or anonymously. The processing status of a notice submitted via the portal can be tracked on the internet-based reporting portal.

### 3. Receipt of a notice

After a notice has been received, the person providing the notice will receive an acknowledgement of receipt. The confirmation of receipt is usually sent immediately; if necessary, the dispatch of the confirmation of receipt may be delayed up to two weeks.

### 4. Editing the notice

After receipt of the notice, the notice is checked centrally and assigned to an administrator. Information about Amadeus FiRe AG companies is forwarded to the relevant employee at the company concerned if necessary. The responsible administrator maintains contact with the person providing the information. The responsible administrator examines the facts and, if necessary, discusses them with the person providing the information. If a violation of human rights or environmental obligations is identified, the responsible case administrator immediately initiates corrective measures. If a human rights or environment-related risk results from a tip-off without a violation having occurred, the responsible administrator initiates preventive measures. Notifications are taken into account within the framework of the risk analysis. The results of the examination of the facts are communicated to the person who provided the notification and, if necessary, further steps are discussed with the person who provided the notification.

As a rule, notifications are processed conclusively within three months of their receipt.

### 5. Anonymous submission of a notice

In principle, notices can be submitted anonymously. If a notice is submitted anonymously, no data will be collected that would allow conclusions to be drawn about the identity of the person submitting the notification. If the person submitting the anonymous tip-off provides information that allows conclusions to be drawn about his or her identity, the information will be treated confidentially.

### 6. Confidential delivery of a notice

In addition, the confidentiality of personal data and other information that allows conclusions to be drawn about the identity of the person providing the notice is guaranteed when a notice is submitted. Only the respective person in charge and the person responsible for the allocation of the tips can view a notice.

### 7. Documentation of notices

Notices are kept for seven years according to § 10 para. 1 p. 2 LkSG.