LVM Versicherung's Rules of Procedure for objection reporting under "LkSG" (=German supply chain due diligence Act)

Last review: 15/04/2026

Introduction

The Board of LVM Versicherung has set up an objection reporting procedure which enables all of LVM Versicherung's stakeholders to draw attention to human rights risks and environmentally-related risks – and also to infringements of obligations concerning human rights or the environment in terms of LkSG (=German supply chain due diligence Act) which may have arisen from the commercially-related activities of LVM Versicherung within its own sphere of business or within the sphere of business of any of LVM Versicherung's direct or indirect providers.

Scope of application

The objection reporting procedure is essentially open to any party wishing to submit reports relating to possible human rights and environmentally-related infringements or risks.[1] All reports that appear to relate to human rights and environmental risks and infringements of duty under the LkSG within the scope of LVM's business or that of a provider to LVM Versicherung will be processed in accordance with these Rules of Procedure.

The LkSG objection reporting procedure can be followed in order to report risks concerning human rights and environmentally-related risks together with infringements of the following duties of caution in human rights and environmentally-related terms, where incurred either by LVM Versicherung and/or by players within its supply chain:

- Prohibition of child labour
- Prohibition of forced labour and of all forms of slavery
- Failure to adhere to industrial safety; work-related health hazards
- Failure to respect freedom of association: Failure to respect freedom of assembly, and entitlement for collective negotiations
- Prohibition of unfair treatment in employment
- Prohibition of withholding reasonable pay
- Destruction of vital natural resources due to environmental pollution
- Illegal infringement of land rights
- Prohibition upon appointing or using private/public security forces which could lead to infringements due to inadequate instruction or supervision
- Prohibition of any action or illicit omission which is directly likely to infringe a protected legal situation in a particularly serious way (where arising from human rights conventions as per § 2, paragraph 1, LkSG) and which is obviously illegal, given a clear assessment of all of the relevant circumstances
- Prohibited manufacture, use and/or disposal of mercury (Minamata Convention)[2]

[1] In the following text, the person who is submitting an objection is referred to as the "reporting person". In the following text, furthermore, the terms "objection" and "report" are used synonymously with each other.

[2] Link

- Prohibited production and/or use of substances coming under the scope of application of the Stockholm Convention (POP [=Persistent Organic Pollutants])[3] and any environmentally unacceptable handling of waste containing POP
- Prohibited importing/exporting of waste classified as hazardous under the Basle Convention[4]

Channels of objection

The following reporting channels are available for the submission of an objection:

Email: menschenrechte@lvm.de
Telephone: 0251-702 56501
Post:

LVM Versicherung
Risk Monitoring and Compliance Department (Compliance Division)
-In person-
LkSG Objection Reporting Procedure
Kolde-Ring 21
48126 Münster

Procedure for LkSG objection reporting

1) Acceptance

   As soon as an objection is received through one of the reporting channels mentioned above, the LkSG reporting office will determine whether the situation described falls within the scope of the LkSG objection reporting procedure. The objection will be accepted if the reporting office concludes that this is the case, or if there are still uncertainties regarding it. The reporting person will therefore receive confirmation of receipt. If the matter in question is outside the scope of the LkSG's objection reporting procedure, it will be referred to the relevant department. The reporting person shall be informed in the confirmation of receipt.

2) Clarification and assessment of the report

   Once the report has been received, the company will conduct a further investigation into the facts in close cooperation with the relevant departments (e.g. Human Resources or Purchasing), and, if necessary, in dialogue with the reporting person. An assessment of the report also takes place.

3) Deriving measures

[3] Link
[4] Link

If necessary, appropriate measures will be derived based on the investigation of the facts, possibly with the involvement of the reporting person. The LVM Versicherung departmental board will take appropriate preventive and remedial measures if necessary.

4) Termination of the objection reporting process
The reporting person shall be informed about the results of the procedure. This completes the LkSG objection reporting process. Employees from the reporting office shall remain at your disposal to answer any questions.

5) Effectiveness review
An effectiveness review takes place once per year, and as required. The derived actions will be implemented in line with the LkSG objection reporting procedure.

Safeguards for the reporting person

As a central, fundamental principle of LVM Versicherung's objection reporting procedure: specifically reported actions are handled confidentially, with protection for the reporting person. For this reason, the identity of the reporting person, as well as that of any other parties potentially involved, will be disclosed only to the staff responsible for the LkSG's objection reporting procedure, if known. For receiving and processing reports, the Board of LVM Versicherung has set up a central office in the Risk Monitoring and Compliance Department (Compliance Division).

The reporting person has the option of independently deciding, at any time during the reporting procedure, either to remain anonymous or to disclose their personal identity to the independent employees – who are specifically bound over to confidentiality. Information will only be forwarded to other departments and LVM a.G. company representatives in accordance with the defined process, and only with the consent of the reporting person.

Reports are processed in a manner compliant with currently applicable data protection requirements.

LVM Versicherung does not tolerate the discrimination or punishment of individuals who file objections. Those involved in investigating human rights and environmental concerns are also protected from retaliation. Should any indications of reprisals arise, the Risk Monitoring and Compliance Department (Compliance Division) will investigate the matter and coordinate measures with the Board, if necessary.