



## Rules of procedure Complaints procedure according to the Supply Chain Due Diligence Act

### 1. scope of application of the complaints procedure:

The Smyths Toys complaints procedure applies to all human rights and environmental risks or breaches of duty that are covered by Section 2 (2) and (3) of the Supply Chain Due Diligence Act (LkSG) with regard to Smyths Toys. Smyths Toys employees, suppliers, business partners or third parties can submit complaints about human rights violations or disregard for environmental standards in our organisation or in the supply chain to us via the Smyths Toys complaints channels.

### 2. complaint channels:

Complaints about human rights violations or the disregard of environmental standards can be reported at any time (also anonymously) to the independent human rights officer of Smyths Toys. The complaints procedure is open to all suppliers, business partners, employees and other third parties at the e-mail address [Menschenrechtsbeauftragter@smythstoys.com](mailto:Menschenrechtsbeauftragter@smythstoys.com).

Furthermore, such complaints can be submitted via the available contact form <https://www.smythstoys.com/de/de-de/kontakt> be addressed to Smyths Toys. Any complaints about human rights violations or the disregard of environmental standards that reach us via these contact forms will be forwarded to the e-mail address: [Menschenrechtsbeauftragter@smythstoys.com](mailto:Menschenrechtsbeauftragter@smythstoys.com).

Complaints can also be sent **by post** to

Smyths Toys EU HQ UC  
Human Rights Officer  
Lyrr 1 Building Mervue Business Park  
Galway H91K4HV  
Ireland

be submitted.

Smyths Toys employees can also submit such complaints directly to their line manager or use the anonymous [whistleblowing system](#) that Smyths Toys has set up for its employees.

The complainants are free to choose which of the aforementioned channels they wish to use for their complaint about human rights violations or the disregard of environmental standards. Regardless of the channel chosen, the complaints received will be treated in strict confidence by Smyths Toys and processed in accordance with these rules of procedure. Smyths Toys employees are trained in accordance with the requirements of the Supply Chain Due Diligence Act.

### 3. course of the complaints procedure:

The receipt of the report via one of the above-mentioned options is documented accordingly. Depending on the channel selected, the report is either sent directly to the responsible human rights officer at Smyths Toys or is forwarded to them and the Supply Chain Due Diligence Act team via [Menschenrechtsbeauftragter@smythstoys.com](mailto:Menschenrechtsbeauftragter@smythstoys.com).

Upon receipt of a complaint, the complainant will be informed immediately about the receipt of the complaint and the responsible contact person.

The facts of the case are discussed confidentially with the complainant(s) and other person(s) concerned with the aim of clarifying the facts of the case. Depending on the facts of the case, a decision is then made as to which persons or departments are to be involved in clarifying and/or eliminating the grievance or risk (e.g. Buying; Human Resources, Legal; Product Compliance, Safety & Quality ; Security; Human Resources; Data Privacy, etc.).

An interim report is then sent to the complainant on the progress and expected duration of the procedure, which varies depending on its complexity.

It goes without saying that we always endeavour to clarify and eliminate any grievances and risks as quickly as possible. Where possible and appropriate, a joint proposal for remedial action is developed together with the complainant and other person(s) concerned. Optionally, the procedure can also be settled by mutual agreement. Any grievances uncovered or remedial measures agreed are implemented and followed up. At the end of the procedure, a final report with the outcome of the procedure and a statement of reasons is sent to the complainant.

### 4. responsibility for appeal proceedings

Responsible for the complaints procedure are

- Human Rights Officer: Kevin Carrucan
- Group Head of Product Compliance, Safety & Quality: Jean Mathelin

➤ Contact: [Menschenrechtsbeauftragter@smythstoys.com](mailto:Menschenrechtsbeauftragter@smythstoys.com) or

➤ Contact form: <https://www.smythstoys.com/de/de-de/kontakt>

### 5. protection of Smyths Toys employees from discrimination and punishment:

The [regulations on the whistleblower system for employees](#) also apply accordingly to information from Smyths Toys employees on human rights and/or environmental risks, so that Smyths Toys employees who, in good faith and without malicious intent, report a grievance under the Supply Chain Due Diligence Act need not fear disciplinary action, even if the facts reported turn out to be false or no further action is taken.