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Rules of Procedure

Complaints system for reports under the Supply Chain Due Diligence Act (LkSG) and the Whistleblower Protection Act (HinSchG)

FRESHFIELDS

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1. Objective

Freshfields PartG mbB ("*Freshfields*") is committed to ecologically and socially responsible corporate governance and operates with a high degree of integrity in all areas.

We also expect our employees to observe the principles of ecological, social and ethical behaviour, integrate them into the corporate culture and implement them in their everyday work. Furthermore, we strive to continuously optimise how we do business and our services in terms of sustainability.

We expect the same behaviour from all our suppliers, service providers, platform partners, distributors, consultants, intermediaries, and other contractual partners (collectively "*business partners"*) and ask our business partners to contribute to this holistically.

The establishment of a complaints procedure not only reflects this aspiration, but also fulfils an essential requirement of the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*, hereinafter "*LkSG*") and the German Whistleblower Protection Act (*Hinweisgeberschutzgesetz*, hereinafter "*HinSchG*"). The aim of the complaints procedure is to be informed as early as possible of (potential) violations of the law within the meaning of the HinSchG (HinSchG) and the LkSG (LkSG) and to take appropriate preventive and remedial measures and avoid possible harm to the persons concerned, our employees and society. All the knowledge gained is also used to continuously improve our own risk management process.

2. Subject matter

2.1 These Rules of Procedure apply to reports or complaints (hereinafter "*complaints*"),

(a) that relate to risks to or violations of human rights or environmental concerns in Freshfields' business or along the supply chain within the meaning of the provisions of the LkSG and

(b) that relate to legal violations within the meaning of the HinSchG that came to light in a professional context.

2.2 Reports under the LkSG

The LkSG refers to a total of fourteen international conventions on the protection of human rights and environmental issues (see here: LkSG).

Specifically, the LkSG identifies the following risks:

- child labour,
- slavery and forced labour,

- disregard for occupational health and safety and work-related health hazards,
- disregard for freedom of association and the right to collective bargaining,
- objectively unjustified unequal treatment in employment,
- withholding appropriate wages,
- destruction of natural resources through environmental pollution,
- unlawful violation of land rights,
- and violating the prohibition of commissioning or using private/public security forces that may cause harm to life and limb and/or other impairments due to a lack of instruction or control.

Environmental risks particularly arise due to improper emissions of

- mercury,
- persistent organic pollutants (POPs) and
- hazardous waste.

2.3 Reports under the HinSchG

Reports under the HinSchG mainly involve concerns raised about violations of national criminal provisions, possible violations of provisions subject to fines regarding the protection of life, limb, health or rights of employees/their representative bodies and concerns about violations of certain pieces of federal and state legislation as well as directly applicable legal instruments of the European Union and the European Atomic Energy Community.

This catalogue includes, for example

- concerns raised about criminal activities, such as bribery, corruption and kickbacks
- concerns raised about breaches of data protection, data security and IT legislation
- concerns raised about criminal conduct in the workplace
- concerns raised about money laundering

3. Procedure for reports via the Freshfields Speak Up Hotline

3.1 Making contact

(a) Who is entitled to complain?

Any person or legal entity (employees and external third parties) can submit a complaint regarding human rights or certain environmental risks or violations that occur in Freshfields' own business or along

the supply chain within the meaning of the LkSG, or regarding (potential) legal violations within the meaning of the HinSchG, that came to light in a professional context.

(b) Complaint channels

The following channels are available for submitting complaints:

- Via our homepage/intranet, the person wishing to report a concern can access the **Freshfields reporting system**, which is designed to receive incoming complaints. The **Freshfields Speak Up Hotline** is available around the clock and includes a separate language selection menu on the input form. (Speak Up Hotline – available here)
- Within the Speak Up Hotline (Speak Up Hotline – available here), the complainant is free to address their complaint **in writing** or **by telephone**. They can also arrange a **personal meeting** with a Freshfields employee. A short note to this effect on the form will suffice. A corresponding meeting will then be arranged within 14 calendar days. With the complainant's consent, the meeting can also take place by video call.
- Via email directly to Speakingup-Germany@freshfields.com
- Complaints can also be sent **by post** or **internal post** to the following address:

  Freshfields PartG mbB
  Legal Department Germany & Austria
  Feldmühleplatz 1
  40545 Düsseldorf

Complaints can be accepted in all living languages and translated into the working language of the complaints procedure (English or German). Upon request, Freshfields will endeavour to communicate in the language of the whistleblower or complainant (hereinafter "*complainant*")

(c) Free complaints procedure

The complainant can use the complaints procedure free of charge. However, Freshfields will not assume/reimburse any costs incurred by the complainant in connection with the use of the complaints procedure, such as internet, telephone costs, travel costs or costs for legal advice.

3.2 Confidentiality of the complainant's identity

(a) Identity protection

All information is processed in accordance with the principle of confidentiality. This applies most notably to personal data. The

identity of the complainant is protected and only used internally to the extent necessary.

(b) Making an anonymous complaint

Irrespective of the aforementioned identity protection, the complainant also has the option of reporting suspected cases anonymously. No personal data (e.g. contact details) is required for this purpose. Submitting a complaint (anonymously) via the Speak Up Hotline on the internet enables protected and direct communication with a Freshfields employee via a mailbox. The complainant can set up a protected mailbox via the Speak Up Hotline for this purpose and should then check it regularly for messages.

3.3 Protection from discrimination or punishment

Freshfields will use all available means within its control to protect the complainant against adverse treatment and reprisals that could arise as a result of a complaint.

This particularly means that Freshfields will not tolerate any adverse treatment or intimidation of the complainant, or any other steps being taken against them.

The protection against discrimination or punishment due to a complaint applies to all complainants who have raised suspected or actual LkSG or HinSchG-related misconduct in good faith. In contrast, knowingly making a false report about an alleged LkSG/HinSchG violation with the aim of deliberately and untruthfully accusing another person may constitute a criminal offence and be prosecuted accordingly by Freshfields and/or state authorities.

3.4 How the complaints procedure works

When a complaint is received via the aforementioned channels, its receipt is first documented.

(a) Confirmation of receipt

Freshfields will confirm receipt of the complaint to the complainant within five to seven days. Depending on the communication channel chosen by the complainant, this can be done in writing, by email or electronically via the Speak Up Hotline.

The Legal Department receives complaints that arrive via the aforementioned channels and forwards them within Freshfields to the relevant specialist departments for handling. For complaints relating to Freshfields' business area, responsibility lies with the relevant practice groups/departments and/or HR, Risk Partners and/or HR Partners. The relevant procurement department is responsible for possible violations in the supply chain.

(b) Complaint investigation and factual appraisal

The complaint handlers will examine the facts provided when the complaint was made. The first step is to check the plausibility of the complaint. This involves examining whether there is enough to indicate based on the submission that the legal interests mentioned in section 2 may be or have been violated.

If the details provided are insufficient to conduct an examination, the complaint handler will contact the complainant to request further information. Should the available fact-based information be insufficient, and the complainant cannot be contacted, the case will have to be closed.

Provided sufficient factual details are available or can be obtained, the handler will discuss the facts with the complainant and examine the facts in detail. When handling the complaint, the aim is to be as transparent as possible to the complainant. Conflicting, legally protected interests of other parties and entities must also be considered, however. Most notably, these include data protection requirements or other confidentiality obligations for investigations into a person. It is particularly important to consider that no information about clients or mandates may be shared with third parties due to the lawyer's professional confidentiality undertaking.

Where required, the complaint handler determines which further investigations are to be carried out. They also ensure that investigative measures comply with the principle of proportionality, i.e. that they are suitable, necessary and appropriate for satisfying the purpose of the investigation.

Investigations are conducted objectively and in full compliance with the presumption of innocence.

(c) Communication of possible results

If the investigation confirms human rights and/or certain environmental risks or violations at Freshfields or at suppliers or other business partners, appropriate follow-up measures (preventive and remedial measures) will be initiated. The measures may, for example, also result in Freshfields taking disciplinary action against employees who have contributed to violations of the provisions specified in the LkSG and HinSchG and/or terminating (possibly temporarily) relationships with direct suppliers or other business partners.

The complaints procedure will be discontinued if, after clarification of the facts, discussion and investigation, it is established with sufficient certainty that there are no human rights and/or no specific environmental risks or violations and/or no violations of the provisions specified in the HinSchG.

The complainant will be informed of the results of the procedure or, if applicable, the reasons for discontinuing it, within a reasonable

period. This feedback should generally be provided within three months of confirmation being provided of receipt of the complaint. Conflicting, legally protected interests of other parties and entities must also be considered when providing this feedback, however. Most notably, the lawyer's confidentiality undertaking means no information about clients or mandates can be passed on to third parties.

(d) Handling time

The handling time for a complaint is highly dependent on the individual case and can take anywhere from a few days to several months, depending on the complexity of the case. In any event, Freshfields will handle and conclude complaints as promptly and expeditiously as possible.

3.5 Amicable dispute resolution – optional

Freshfields reserves the right to offer an amicable dispute resolution procedure at any stage of the complaint procedure.

3.6 Data protection

Complaints are handled in accordance with the applicable data protection regulations. Only the personal data required to handle the complaint procedure will be processed and stored. At the end of the procedure and the relevant retention periods, the personal data will be anonymised or deleted. For more information, please refer to our privacy policy [Speak Up Hotline – Data Privacy]

3.7 Protection of trade and business secrets and the lawyer's confidentiality undertaking

(a) Information provided to the complainant

Freshfields remains bound by business and trade secrets obligations. Therefore, information that is subject to this secrecy shall not be passed on to third parties. The same applies to information on clients and mandates based on the lawyer's professional confidentiality undertaking.

(b) Lawyer's confidentiality undertaking regarding reports to external bodies

The obligation to uphold the **lawyer's confidentiality undertaking** must also be observed if a report under the Whistleblower Protection Act (HinSchG) is made to an external reporting point such as (i) the Federal Office of Justice (available here), (ii) two external reporting offices at the Federal Cartel Office (available here) and (iii) at the Federal Financial Supervisory Authority (available here). A report relating to a client mandate must be submitted to the internal reporting point (Speak Up Hotline – available here).

Reports under the LkSG or other reports **fundamentally cannot** be submitted to an external reporting point.

4. Final provisions

If you have any questions in connection with these Rules of Procedure, please contact Speakingup-Germany@freshfields.com.

These Rules of Procedure does not create any obligations for the firm beyond the provisions of the HinSchG and LkSG.

These Rules of Procedure may be amended by the firm at any time in accordance with applicable law.

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