Rules of Procedure for the Complaints Procedure pursuant to Section 8 of the Supply Chain Due Diligence Act (LkSG)

As the Busch Group, we are aware of our responsibility and duty of care and are committed to respecting human rights at all levels of our business operations and along our entire supply chain. As a Group with subsidiaries and production sites operating worldwide, we consider respect for human rights to be one of the basic prerequisites for our business activities. This is in line with our corporate goal of contributing to a sustainable society.

These Rules of Procedure* define the Busch Group's complaints procedure in accordance with the requirements of Section 8 of the Supply Chain Due Diligence Act (LkSG). It is used to address complaints about violations of human rights or environmental regulations related to the business activities or supply chains of the Busch Group.

1 Scope of the procedure

The complaints procedure is accessible to all employees, business partners and third parties who have reasonable grounds to believe that human rights and/or environmental obligations have been violated or are reasonably likely to be violated in the course of business activities in their own business area or within the supply chains of the Busch Group.

We encourage our employees and stakeholders to communicate complaints and information about suspected human rights violations.

2 How do I file a complaint?

We provide all stakeholders with a web-based whistleblowing system through which they can report concerns about our activities or the activities of our suppliers regarding suspected human rights or environmental due diligence violations. These channels are accessible worldwide, both inside and outside our company.

The complaints procedure is publicly accessible via the Busch Group website (see https://busch-group.integrityline.app), free of charge and available around the clock. There are 29 languages available for input.

3 Who handles my complaint?

Responsibility for the whistleblower system and the implementation of the complaints procedure lies with our Group-wide Compliance department. Our human rights officer will also be involved in the process as required.

All persons entrusted with the implementation of the procedure are impartial, independent, not bound by professional instructions, bound to confidentiality, appropriately trained and equipped with sufficient time resources.

*Only the German version is legally valid and binding; this translation is for information purposes only.

4 How does the complaints procedure work?

4.1 Receipt of the complaint or notification

The whistleblower has the option of providing their contact details or not.

When submitting the complaint, a random case ID will be provided. This ID and a password, which must be defined by the complainant, enable access to a secure mailbox.

The mailbox is used to send further information about the case or to view case-related information. If desired, all communication with us will remain anonymous.

If an e-mail address has been specified, an e-mail is sent to inform you that new messages have been sent to the secure mailbox. If an anonymous report has been selected, the mailbox should be checked at regular intervals.

4.2 Testing the complaint or notification

Incoming reports are first examined to determine whether there is a human rights or environmental risk or a breach of human rights or environmental obligations. Furthermore, it is also checked which company or supplier is affected by the report in order to further discuss the information with the responsible authorities.

4.3 Work out a solution with the whistleblower

The next step is to clarify the situation. The whistleblower is informed about the next steps and the expected time schedule.

If a suspicion is confirmed and a violation of human rights and/or environmental obligations is imminent or already exists, appropriate remedial measures will be initiated immediately. In order to prevent the recurrence of similar risks, it is checked whether corresponding preventive measures need to be defined and implemented.

4.4 Completing the procedure

The whistleblower will be informed of the completion of the complaint procedure via the secure mailbox.

5 Confidentiality and data protection

All personal data collected within the framework of the complaints procedure is subject to strict data protection provisions. The identity of the complainant will be treated confidentially, unless otherwise requested or required by law.

All reports are processed exclusively by a small group of selected and specially trained employees.

All personal data and other information that allows conclusions to be drawn about the identity of the whistleblower will be treated confidentially both during and after the completion of the procedure.

6 Non Retaliation Policy

The Busch Group has an anti-retaliation guideline against people reporting concerns in good faith. You will not lose your job or benefits or be degraded, suspended, threatened, harassed or discriminated against because you raise your concerns in good faith. Anyone who violates our Non-Retaliation Policy must expect disciplinary action in accordance with applicable law.