

1. January 2023

Rules of Procedure for the Complaints Procedure under the Supply Chain Due Diligence Act (LkSG)

The reason we as Munich Re exist and the impact we want to have in the world is to help humankind to act braver and better. Accordingly, compliance with the Supply Chain Due Diligence Act is a top priority for Munich Re / ERGO Group. Violations can have serious consequences for our Group, our employees, our business partners and other affected parties and must therefore be identified at an early stage so that appropriate countermeasures can be taken, and potential damage averted.

Accordingly, we have established an effective grievance mechanism for reporting human rights and environmental risks or violations. Uniform and fast processes as well as confidential and professional processing of complaints by internal experts form the foundation of this system.

The most important information on the complaints procedure is set out below in an understandable, comprehensive manner and in the spirit of the greatest possible transparency.

1. For what kind of complaints and notices can our complaints procedure be used?

The complaints procedure can be used to report all allegations of possible violations of laws and/or regulations, including human rights or environmental risks or violations relating to the company's own business operations and along the entire supply chain.

2. Which complaint channels can you use to submit a complaint?

All employees and external persons can submit complaints through the following channels:

- Via the **electronic whistleblowing system**. The input mask is available in German and English. It is free of charge and can be accessed around the clock.
- **By post**, by **internal mail** or by **email** to the Compliance Department at the following address:

ERGO Group AG
Department Compliance ERGO
ERGO Platz 1
40198 Düsseldorf, Germany
via email to: Hinweisgeber@ergo.de

- **In person**: If reporting in person, please make an appointment in advance via Hinweisgeber@ergo.de.
- To our external and **independent ombudsperson** Markus Brinkmann by post, email or telephone using the following contact details:

BDO AG Wirtschaftsprüfungsgesellschaft
Markus Brinkmann
Fuhrentwiete 12
20355 Hamburg, Germany
Fon.: +49 40 33 47 53 74 35
via email to: Ombudsmann.ergo@bdo.de

Employees can also contact their supervisors or local compliance contacts.

3. How will my complaint be dealt with?

Regardless of which communication channel is chosen, we treat all information confidentially. However, we are obliged to observe legal obligations to provide information to authorities as well as legal exceptions to the confidentiality requirement. The confidentiality of the identity of the whistleblower as well as of the other persons named in the complaint is maintained throughout the entire process.

All information is processed by appointed and specially trained employees of the Compliance department (hereinafter referred to as the Complaints Office). They are impartial, independent in the performance of their duties and bound to secrecy. They are also obliged to comply with data protection regulations and to ensure transparency and the rights of all persons concerned.

4. How am I protected as a complainant?

Protecting complainants from being discriminated or punished because of complaints or whistleblowing is an important part of our complaints procedure. Intimidation and reprisals against persons who report actual or suspected misconduct in good faith will not be tolerated.

If you feel that you are suffering intimidation or reprisals as a result of your complaint, contact the Complaints Office; such intimidation or reprisals will also be investigated in accordance with the procedures outlined above and further investigated if necessary.

As far as complainants are affected who are employees of a direct supplier, the company shall endeavour to make appropriate contractual arrangements with the supplier.

5. What happens after I submit my complaint?

5.1 Receipt of a complaint

After a complaint is received, its receipt is documented internally and the complainant receives an acknowledgement of receipt within one week.

5.2 Review of a complaint

The Complaints Office first checks whether sufficient information is available for the examination and investigation of the notified facts.

If this is not the case, the Complaints Office will, if possible, contact the complainant to ask for further information. If neither sufficient information is available nor contact is possible, the case will be closed.

5.3 Investigation of the complaint

The Complaints Office itself investigates the matter comprehensively or forwards it to the competent department, e.g. within the company, for investigation, while respecting the principle of confidentiality and data protection. If necessary and as far as possible in the case of anonymous complaints, the Complaints Office or the competent department will discuss the merits of the case with the whistleblower and, if necessary, ask for further information.

If, after clarification of the facts, discussion and investigation, the Complaints Office or the competent department is convinced that human rights and environmental risks and violations do not exist in its own business area and with suppliers, the case is closed.

5.4 Development of a corrective solution

If, in the opinion of the Complaints Office or the other responsible department, the investigation confirms human rights and environmental risks or violations in the company's own business area and at suppliers, a proposal for further corrective action (in particular preventive and remedial measures) is drawn up. As far as possible and reasonable, the whistleblower will be involved in the process.

5.5 Implementation and follow-up

The implementation of the proposed solution is finally followed up by the Complaints Office or the competent other department.

5.6 Conclusion of the procedure

The whistleblower will be informed of the conclusion of the complaint procedure, if possibility.

The processing time differs on a case-by-case basis and can therefore take from a few days to several months. However, we strive to complete the investigation in a timely manner.