

RULES OF PROCEDURE – MEESENBURG COMPLAINTS OFFICE

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Introduction

These Rules of Procedure apply to our standardized complaint and reporting procedure for violations of legal and internal regulations, in particular under the General Equal Treatment Act (AGG), the Whistleblower Protection Act (HinSchG) and the German Supply Chain Due Diligence Act (LkSG), as well as the internal Code of Conduct.

1. Does Meesenburg have a company-wide procedure?

Yes. Meesenburg runs a company-wide, transparent, publicly accessible, standardized complaints and reporting procedure. All complaints and reports from employees or third parties are treated equally to the extent permitted by law.

2. Who can file complaints and reports?

The complaints and reporting procedure is accessible to everyone. Employees (including applicants, temporary workers and former employees) as well as persons and organizations outside the Meesenburg Group such as customers, suppliers, other third parties concerned and persons with knowledge of a (possible) violation can report complaints and information.

3. What can I report?

Any reasonable suspicion of an actual or potential violation of legal or internal regulations, cf. in particular § 2 HinSchG (German Whistleblower Protection Act). The suspicion can either be directed at individual employees or exist in connection with Meesenburg's business activities.

Furthermore, reports can be made if there is a suspicion that concealment or cover-up measures are being taken by those acting. This may also include abusive acts or omissions that run counter to the objective or purpose of the regulations in the provisions or areas of law that fall within the material scope of application pursuant to § 2 HinSchG.

Please only make complaints or reports if you are convinced that the actual information is accurate.

4. What are the requirements for a report?

a. Good faith

Only such reports shall be made where the person making the report has a good faith belief that the facts reported by him/her are accurate and true. It is not in good faith if it knows that a reported fact is untrue. In case of doubt, relevant facts shall not be presented as fact, but as conjecture, evaluation or statement of other persons. In the case of a tip-off, any doubts must be pointed out.

b. Reasonable Suspicion

The whistleblower should report only those cases where he or she has a reasonable suspicion that an event relevant under these Rules has occurred. It will not be clear to the whistleblower in all cases whether a particular act or conduct should be reported in accordance with the principles of these Rules. The whistleblower should consider this carefully before reporting.

c. Concrete and conclusive

Each reference should be as specific as possible. The person making the reference should provide as detailed information as possible about the matter being reported so that the matter can be properly assessed.

d. A report must contain at least the following information:

- Cause of the report;
- Background and progression of events;
- Name of the people involved;
- Date and time of the incident;
- If available: documents, evidence.

e. Personal experiences, possible prejudices or subjective opinions are to be marked as such.

Appropriate action may be taken against whistleblowers if it is determined that false information has been knowingly reported.

5. Do I have different options to file complaints or reports?

Yes. Whistleblowers can use the following channels for filing complaints or reports:

1. Digital Whistleblower System:

All whistleblowers can submit a complaint or a report via our digital whistleblower system. You can access the whistleblower system at the following link:

https://whistly.org/file_report/meesenburg?lang=en.

If you wish, the whistleblower system can be used anonymously.

The whistleblower system is available in German and English and is managed by an independent operator. The data is stored on protected servers in Germany. The content of the reports is processed by Meesenburg.

2. Direct contact:

All whistleblowers may contact the following office by mail, telephone or e-mail:

**Meesenburg Großhandel KG
Complaints Office (confidential)**

Westerallee 162

24941 Flensburg

Germany

Tel.: +49 461 58089000

beschwerdestelle@meesenburg.de

Employees of the Meesenburg Group may also contact their supervisor at any time. However, there is explicitly no obligation to report to superiors.

6. Who will take care of my complaint or report?

The internal complaints office. All complaints and reports go to this office - regardless of who reported them and how. The employees of the reporting office are impartial and are subject to a special duty of confidentiality. They are not bound by instructions in this function.

7. Will my identity be kept confidential?

Yes. All complaints and reports are treated confidentially and can also be submitted without mentioning your name. It is particularly important for us to treat your concerns confidentially, and we protect you as the person making the report. Confidential data may only be disclosed if this is necessary and legally permissible. If you have contacted your supervisor, they are also obligated to confidentially forward the report received to our complaints office.

8. Will I be notified that my complaint or report has been received?

Yes. Once we receive your complaint or report, you will receive a confirmation of receipt within 7 days.

9. Are all complaints and reports processed?

Yes. We take every complaint or report very seriously. The Complaints Office checks whether the complaint or report contains sufficient information to conduct a further investigation. If further information is needed, the Complaints Office will - if possible - contact you.

10. What happens to my complaint or report once it has been reviewed?

As soon as the complaint or report has been investigated, the complaints office can process the case itself or forward it to a responsible department within the company for further processing and clarification of the facts or, if necessary, to a competent authority. During the investigation, the Complaints Office reviews all relevant documents, speaks with witnesses and affected persons as necessary, and analyses electronic data if necessary and permissible.

If we can reach you, we will inform you within three months about the measures taken - even if the investigation has not been completed by then.

11. Are there any guidelines for the investigation?

Yes. All representatives of the complaints office must adhere to certain rules of conduct, such as:

- We investigate all reports and complaints through internal investigations based on transparent and clearly defined processes. Our investigations are always conducted in compliance with the relevant laws and regulations.
- Any fact-finding must be fair, objective, without prejudice and with respect.
- The presumption of innocence applies to all internal investigations.
- As soon as a reporting officer notices that it is not possible for him or her to conduct the fact-finding objectively for personal reasons, he or she must report this conflict of interest and relinquish the processing.
- Those affected by the complaint or report have the right to be heard.
- Data and information must be treated confidentially and the person making the report must be protected. Neither their name nor details from the report may be disclosed without reason.

12. Am I protected as the person providing information?

Yes. You are protected as a whistleblower within the framework of the above-mentioned requirements. By way of exception, you are even permitted to disclose secrets under the conditions of § 6 HinSchG. Anyone who intentionally or grossly negligently asserts falsehoods is not protected.

Individuals who file complaints or reports in good faith will not be retaliated against or penalized in any way for doing so. Meesenburg will not tolerate retaliation of any kind. If you believe that you or anyone else has been retaliated against or that you or they have been discriminated against in any way for filing a complaint, please notify Meesenburg immediately through one of the Company's reporting channels listed above. We will investigate all plausible allegations of discrimination. Substantiated allegations of discrimination by Meesenburg will be dealt with accordingly.

Anyone who intentionally or grossly negligently makes false claims is not protected. In this case, your identity is also not protected.