

# Rules of Procedure

## - BSH's grievance mechanism

### A. Subject of regulation

In its mission statement, BSH Group ("BSH") is committed to acting responsibly and lawfully. We refuse to do business that violates applicable law, internal policies or the standards to which BSH is committed. This applies worldwide and to the entire organization. This clear position and adherence to the principles enshrined in our BSH Business Conduct Guidelines ("BCGs") form the basis for the high regard in which BSH and its brands are held by its employees, customers, business contacts and the general public.

Inappropriate behavior, even by individuals, can damage the trust that we work hard to earn every day. Therefore, it is essential for us to carefully investigate indications of possible misconduct within our own company but also in our supply chain. This enables us to identify and correct misconduct in good time, to react appropriately, to protect ourselves from negative effects, to take the necessary corrective measures and to continuously improve our processes and controls.

Therefore, we encourage all stakeholders to contact us if they have evidence of misconduct or a violation of laws, policies or regulations. This encouragement applies equally to employees or temporary workers, as well as to suppliers, customers, service providers, residents at one of our sites or others potentially affected by our business activities. As a representative of non-governmental organizations ("NGOs"), you can also contact us with your concerns at any time.

BSH commits to lawful  
conduct and  
encourages  
whistleblowing

## B. Which reporting channels can be used to submit information?

BSH offers different reporting channels

In order to reach as many potentially affected persons as possible, we offer the following reporting channels for submitting information:

- Our BKMS® whistleblower system Trust and Tell (<https://www.bkms-system.net/bshg>), operated by an external provider and accessible worldwide and around the clock via the internet and the BSH homepage, offers company employees as well as external parties a barrier-free notification submission in many languages, unrestricted in terms of location and time. The BKMS® system is a web-based ASP application (ASP = Application Service Provider) that is operated and provided in an independent, closed system (no cloud solution). The system is certified in accordance with European data protection law, meets the highest data security standards and demonstrably does not allow access to reporting data by the operator itself or third parties. It is even possible to submit anonymous reports. In such a case, neither BSH employees nor the external operator can draw conclusions about the identity of a whistleblower. A protected mailbox accessible only to the whistleblower enables (anonymous) communication between BSH and the whistleblower.
- BSH employees can alternatively contact their respective Local Compliance Officer (LCO) directly (contact on the Compliance Intranet).
- Whistleblowers who prefer to contact an external person of trust can contact our lawyer of trust Dr. Karl Sidhu (SvS Attorneys at Law) at the following e-mail address or telephone number:
  - ✉: Widenmayerstr. 36, 80538 Munich, Germany
  - @: [sidhu@svs-legal.de](mailto:sidhu@svs-legal.de) (all languages)
  - ☎: +49 (0)89 244 133 4 60 (English and German)
- Notifications by letter should be sent by post to BSH Hausgeräte GmbH, GLE-CI, Carl-Wery-Str. 34, 81739 Munich, Germany.
- In countries where local whistleblower regulations have been introduced in relation to the matters covered in this Rules of Procedure, additional local channels for reporting may be established. These additional local reporting channels will be published on the respective local Compliance websites.

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

BSH takes reports on all risks and infringements

The aforementioned reporting channels can be used to report any risks and violations of applicable laws or BSH internal regulations ("compliance violations"), including actual or potential violations of human rights or environmental obligations in the context of BSH's economic activities in its own business area and those of its direct and indirect suppliers.

The human rights risks include in particular the violation of the prohibition of child labor, the violation of the prohibition of forced labor

and all forms of slavery, the disregard of occupational health and safety and work-related health hazards, the disregard of the freedom of association and collective bargaining, the violation of the prohibition of unequal treatment in employment, violation of the prohibition on withholding a decent wage, destruction of natural livelihoods through environmental contamination, unlawful violation of land rights, and violation of the prohibition on hiring or using private/public security forces that may cause harm due to lack of instruction or control.

Environmental risks arise in particular in connection with mercury, persistent organic substances (POPs) and hazardous waste.

Whistleblowers should give their descriptions and statements of facts as clearly and in as much detail as possible so that they can also be understood by non-specialized persons. In the case of Trust and Tell reports, after a brief information and security check, whistleblowers are asked to state the focus of their report, if possible, and to provide information on the parties involved and the time period of the violation.

For further clarification of the facts, it is helpful if whistleblowers are available to answer questions. For this purpose, it is useful to set up a protected mailbox (see above).

#### D. Who in the company handles incoming tips?

Within an interdisciplinary BSH internal reporting office, all information is received and processed by specially trained employees according to the division of tasks below. Depending on the underlying facts, reports are forwarded to the department responsible for the respective subject of the report or complaint.

BSH Compliance Organization (GLE-CI) and members of GLE units established locally to support and/or maintain the reporting process (e.g. LCO)	<ul style="list-style-type: none"> <li>Operates and maintains the reporting channels shown above (reporting office).</li> <li>Classifies the incoming messages and forwards them to the responsible departments for evaluation and processing.</li> </ul>
Global Human Resources (GHR)	<ul style="list-style-type: none"> <li>Deals with indications of violations of human or employee rights in BSH's own business area (e.g. indications of mobbing, discrimination, violations of the General Equal Treatment Act (AGG) and violations of the regulations on occupational safety).</li> </ul>
Global Purchasing (GPU)	<ul style="list-style-type: none"> <li>Deals with indications of violations of human rights or environmental obligations in the</li> </ul>

	BSH supply chain (production material and indirect purchasing).
GPL-LOT	▪ Deals with indications of violations of human rights or environmental obligations in the BSH supply chain (logistic supplier).
PCS-SP	▪ Deals with indications of violations of human rights or environmental obligations in the BSH supply chain (external service partners).
Corporate Operations & Steering Environment and Safety (COS-ES)	▪ Deals with indications of environmental risks and violations in BSH's own business area.

#### E. What happens after we receive a complaint?

For the purpose of transparent communication towards all whistleblowers, we show below the typical course of a complaint procedure

All reports are processed and examined in a regulated procedure



##### ▪ Receipt of the notice

If a complaint is received via the reporting channels described above, its receipt is documented internally. The whistleblower will receive a confirmation of receipt of his or her report within 7 days at the latest. This can be done in writing, by e-mail or electronically via the digital whistleblowing system Trust and Tell, depending on which communication channel was chosen.

##### ▪ Examination of the scope of application and plausibility check

The central reporting office checks whether the report received falls within the scope of the procedure. If this is not the case, the person providing the information receives a corresponding response and, as far as possible, the name of the department responsible for the topic (e.g. BSH Customer Service). Each tip is carefully checked for plausibility and categorized in order to forward it to the responsible department if necessary.

If an examination is not possible due to a lack of sufficient information, the reporting office will contact the whistleblower to request further information, if this is possible.

If neither sufficient information is available nor contact can be made, the procedure is closed due to lack of substantiation.

- **Investigation and processing of the facts**

The reporting office ensures that all reports are investigated appropriately. The topic owner (s. above) examines the facts thoroughly. In addition to obtaining background information, examining documents, analyzing data and conducting interviews, the reporting office may also enter into dialogue with the whistleblower in order to discuss the facts together and, if necessary, to bring about an amicable settlement of the dispute.

If, after clarification of the facts, discussion and investigation, of the reporting office is convinced that human rights and environment-related risks and violations of human rights-related or environment-related obligations do not exist in its own business area and at suppliers, the whistleblower will be informed accordingly. In this case, the procedure will be closed.

- **Development and implementation of remedial measures**

BSH's top priority is to put an end to an identified violation as quickly as possible and to work out a solution together with the person concerned. In addition, if individual misconduct by an employee is identified in the course of clarifying the facts, this can be punished with appropriate disciplinary measures. In order to avoid a repetition of the violation in the future, further remedial measures such as process and control improvements can also be defined and implemented.

- **Review of the measures and the result**

In the context of relevant violations, stipulated hereinto, BSH evaluates the results achieved together with the whistleblowers in order to find out whether the measures were or are effective or whether improvements need to be made.

## **F. What principles apply in the procedure?**

BSH has committed and authorized itself and all investigating employees within the framework of Group-wide guidelines and processes to process all information independently and impartially, carefully and confidentially. The principles of a fair process are paramount. In addition, the principle of proportionality must always be observed. For accused persons, the presumption of innocence applies as long as the opposite is not proven. Our employees who are responsible for receiving and processing reports are experienced in dealing professionally with reports and the underlying facts and are continuously trained on our processes and the relevant topics. We also ensure that they can act independently of instructions with regard to their investigative tasks. The processing of reports is

carried out within the framework of the applicable data protection regulations.

However, BSH is required to comply with statutory obligations to provide information to authorities and statutory exceptions to the confidentiality requirement.

#### G. What is the timeline of the procedure?

Although reported matters often vary greatly in scope and complexity, making it difficult to set a generally applicable timetable, BSH will endeavor to conduct investigations as expeditiously and efficiently as possible.

Irrespective of the duration of the individual investigation, whistleblowers receive a final summary feedback on their whistleblowing and the measures taken after the conclusion of the procedure. Feedback is provided at the latest three months after receipt of the report. In this process, data protection regulations and other confidentiality requirements are observed and overriding company interests are taken into account.

The procedure is carried out swiftly; whistleblowers receive feedback

#### H. How are whistleblowers protected in the proceedings?

In the Business Conduct Guidelines and in the group-wide policy on internal investigations, BSH has firmly established that no discrimination will be tolerated against employees who in good faith report possible or actual violations, or who support investigations in any other way (e.g. as witnesses or experts). This protection is also strengthened by our measures to maintain confidentiality ('need-to-know' principle) and rules for dealing with conflicts of interest. BSH will endeavor to provide comparable protection for external whistleblowers (e.g. employees of a supplier).

A violation of this explicit prohibition of discrimination can be reported according to the rules described here.

BSH does not tolerate any discrimination against whistleblowers; confidentiality is an essential principle of the procedure

#### I. What are the effectiveness controls?

The results of the risk analysis and findings on potential target groups and those affected are taken into account when setting up and operating the procedure and when processing reports. Based on these findings, the effectiveness of the procedure described above will be reviewed annually and on an ad hoc basis. If necessary, BSH will make appropriate adjustments and changes to the accessibility and process of the complaints procedure. Suggestions and feedback from whistleblowers are welcome.

In addition, findings and experiences from the processing of reports are incorporated into the continuous further development of the risk management system for the implementation of due diligence, for

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example in risk assessment and prioritization and in the development of preventive measures.

**J. Reporting**

As BSH places great emphasis on transparency, it regularly publishes information on the number of reports received, the topics, the conclusions drawn from the reports and the measures taken. The information is always published in anonymous form, i.e. without mentioning names.

**K. Who is responsible for the complaints procedure in the company?**

If you have any questions about making a report or the process described here, whistleblowers and potentially affected persons can contact the global Compliance Investigations Team ([compliance-investigations@bshg.com](mailto:compliance-investigations@bshg.com)).