



REPORTING PROCEDURES (SUPPLY CHAIN DUE DILIGENCE ACT)

Reporting procedures in accordance with Section 8 of the Supply Chain Due Diligence Act

Introduction

Berenberg has implemented reporting procedures which enable individuals to report actual or possible breaches of human rights or environmental safeguards which have arisen in the context of Berenberg's business activities or indirectly in the context of a supplier.

The whistleblower can make the report publicly or anonymously if desired.

Following the report, Berenberg may implement preventative and remedial measures and adapt existing processes insofar as deemed necessary following a thorough review of the circumstances of the case.

This document outlines the procedures Berenberg has implemented in the context of the Supply Chain Due Diligence Act whereby individuals can raise concerns regarding the protection of human rights and the environment in Berenberg's supply chain.

I. Scope of procedures

The procedures cover all reports and notifications made in relation to potential environmental hazards or breaches of human rights safeguards.

This includes the following issues:

- Child labour
- Forced labour and all forms of slavery
- Flouting of occupational health and safety standards
- Disregard of freedom of assembly
- Workplace discrimination
- Withholding of a reasonable wage
- Environmental damage resulting in the destruction of natural resources
- Violation of land rights
- Violence committed by private or public security forces
- All other environmental hazards, e.g.: illegal use of mercury (as per the Minamata Convention), illegal use of persistent organic pollutants (as per the Stockholm Convention) as well as hazards in connection with toxic waste (as per the Basel Convention)



II. Making a report

1. Online Whistleblowing System

Berenberg has had a data-privacy certified online whistleblowing system in place for several years. Whether made anonymously or not, all reports are treated with the utmost confidence and personal data is protected at all times. Reports can be made via this system. The online whistleblowing system is accessible via the following link which is also available on Berenberg's homepage.

<https://www.bkms-system.net/BERENBERG>

2. Email

There is also the possibility of emailing Berenberg a report. The following email address can be used and is also available on Berenberg's homepage:

Beschwerde-LkSG@berenberg.de

III. Reporting Process Overview

All reports are handled by a specialist review team following a set process. Members of the team are impartial and independent.

1. Submission and review of report

Whistleblowers will receive confirmation of that their report has been received within seven days of its submission. The report will then be reviewed. During this period there may be further questions which can be clarified with the whistleblower, where contact is possible. Next steps will be determined based on the contents of the report.

Reports will be treated in confidence and only passed on to persons required to review the circumstances of the case.

2. Clarifying the facts of the case

The review team will look into the matter on a needs-based, case-by-case and timely basis. The credibility of the report will be checked and all relevant information compiled. The whistleblower will be kept up to date on the progress and timeframe of the review. The whistleblower can log into the online whistleblowing system to see updates on their case.

Depending on the complexity of the case, the length of the review may vary from a few days to several months.

3. Case closure

The aim is to progress the case as efficiently as possible and to bring it to a satisfactory conclusion. The result may be that preventative or remedial actions may be necessary. These will be implemented, monitored, documented so as to be readily auditable and regularly reported to the Human Rights Officer.

So far as legally permitted, the whistleblower will be informed of the measures taken.

The whistleblower will receive an explanation in the event that the report is rejected.



IV. Protection against discrimination or punishment

Whistleblowers must not fear discrimination or punishment as a result of making a report. Berenberg will not tolerate recriminations in any form as a result of a report made.

As long as the whistleblower is employed at Berenberg they will have protection from dismissal, demotion, suspension, threats, harassment or other forms of discrimination in relation to their work or employment conditions.

V. Review of effectiveness of reporting procedures

The appropriateness and effectiveness of the reports procedures will be reviewed annually and on an ad hoc basis.