



wintershall dea

Rules of Procedure

for the grievance mechanism according to German Supply Chain Act (GSCA)

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We consider respecting human rights as a central element of our corporate responsibility and want to foster the trust of our employees, stakeholders, business partners, neighbors and other potentially affected parties in the long term. For this reason, we have implemented procedures to investigate complaints and reports and to deal with them appropriately.

These rules of procedure describe the handling of complaints relating to human rights or environmental risks in accordance with GSCA.

1. Subject of the procedure

All human rights and environmental risks, misconduct and/or actual violations within the meaning of Section 2 GSCA (hereinafter referred to as "human rights cases") can be reported.

For reports beyond this, please refer to the information on our [compliance website](#).

2. Persons providing reports

Reports can be submitted by all internal and external persons. If desired, reports can be submitted anonymously.

3. Reporting channels and submission of a report

Reports can be made by anyone (internal or external) through our [whistleblower system SpeakUp](#) or in person, in writing, electronically or by telephone. The first course of action should be to discuss concerns directly with the person(s) involved, the supervisor and/or the Human Rights Coordinator. However, if this does not seem

possible, is not desired by the reporting person (whistleblower) in an individual case, or anonymity is preferred, SpeakUp can also be used directly. Only those case workers who are responsible for receiving the case report and/or processing the respective case have access to this SpeakUp report. Detailed information on SpeakUp and the options for submitting a report can be found on our [Compliance website](#). Whistleblowers can choose the reporting channel that is most suitable for them under the circumstances.

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4. Processing of a report

To process the case, a plausibility check is carried out first. If it relates to a human rights case, the report is forwarded internally to the responsible human rights coordinator. The latter confirms receipt of the report within seven days and informs the Corporate Human Rights Coordinator about receiving the report. Afterwards the responsible human rights coordinator involves the relevant subject matter experts in order to clarify the facts, define measures and provide feedback to the reporting person, if possible with the involvement of the reporting person.

As each case must be considered individually, the time required for processing may vary. Wintershall Dea aims to provide feedback on human rights cases within three months of receiving the report from the reporting person. Finally, a report is submitted to the Corporate Human Rights Coordinator, agreed measures are implemented and, where possible, their effectiveness is reviewed.

If either the plausibility check or subsequent investigation of the facts reveals that the report does not contain a human rights case or is not substantiated, the reporting person is informed accordingly by the responsible human rights coordinator and the procedure is terminated and documented.

Throughout the entire procedure, our aim is to inform and involve the reporting person as far as possible. Each report is treated confidentially and, if requested, anonymously. The persons responsible for processing the case are independent in the performance of their duties and are bound to secrecy and impartiality.

5. Protection from retaliation and reprisals

Retaliation directed against reporters who make a report in good faith is prohibited. This also applies to threats and attempts of retaliation. This also applies if, after internal investigation, the case is judged to be unfounded but the person was in good faith at the time of the report.

6. Effectiveness of the procedure

The effectiveness of the complaints procedure is reviewed at least annually or on an ad-hoc basis.