

# Rules of procedure for our Whistleblower system

Helping people to act more courageously and better is a top priority for Munich Re. 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 in order to initiate appropriate countermeasures and avert potential damage. By actively engaging our people and safeguarding the integrity of our Group, we can build a responsible and successful future together.

The purpose of this rules of procedure is to provide a structured way to receive and process information about possible violations of laws, policies or ethical standards within our Group.

It is designed to provide a transparent, confidential and fair environment in which employees, managers, contractors and others ("whistleblowers") can feel comfortable reporting concerns or complaints.

We encourage all whistleblowers who have concerns or observe violations of laws, policies or ethical standards to use this procedure to make reports.

It is our firm policy that whistleblowers who act in good faith and provide information responsibly will not suffer any adverse consequences or sanctions.

The most important information about our whistleblowing system is presented below in a clear, understandable and transparent manner.

## 1. What can be reported?

A whistleblower complaint may relate to potential compliance breaches (which have occurred or are very likely to occur) in relation to, for example:

- Regulatory
- Human Rights or other ESG issues
- Corruption / bribery
- Other white collar crime (fraud, embezzlement, etc.)
- Data Protection
- Antitrust / competition
- Insider Trading / market manipulation
- Anti-Money Laundering (AML)
- Sanctions
- Information security

as well as other issues that do not necessarily fit into any of the above categories or that defeat the object or purpose of any underlying rules or regulations (legal or internal).

The violation does not have to be proven beyond all doubt. A report can also be made on suspicion. If there is only a likelihood of a violation, these reports must be based on specific facts or incidents. Deliberately untrue statements must be avoided.

## 2. How to make a complaint?

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

- Via the electronic whistleblowing system. The whistleblowing form is available in English and German. It is free of charge and available 24 hours a day.
- **By post, by internal mail, by e-mail or by telephone** to the Compliance Department at the following address:

ERGO Group AG  
Compliance Department ERGO  
ERGO Platz 1  
40198 Düsseldorf  
Email: [hinweisgeber@ergo.de](mailto:hinweisgeber@ergo.de)  
Phone: +49 211 477-2553

- **In person:** For personal notification, please make an appointment in advance via [hinweisgeber@ergo.de](mailto:hinweisgeber@ergo.de).
- Our external and independent ombudsperson, Markus Brinkmann, by post, email or telephone using the contact details below:

BDO AG Wirtschaftsprüfungsgesellschaft  
Markus Brinkmann  
Fuhrentwiete 12  
20355 Hamburg, Germany  
Email: [Ombudsmann.ergo@bdo.de](mailto:Ombudsmann.ergo@bdo.de)  
Phone.: +49 40 33 47 53 74 35

Employees can also contact their line manager or the local compliance contact.

Anonymous reports and complaints will be accepted provided they contain sufficient information to conduct an investigation. However, there may be restrictions on anonymity if further information is required. Reports should be as detailed as possible. They should include all relevant information, including date, place, people involved and a clear description of the alleged offence.

### **3. How will my complaint be dealt with?**

We treat all information as confidential, regardless of the channel through which it is communicated. However, we are required to comply with legal obligations to provide information to authorities and with legal exceptions to confidentiality.

The confidentiality of the identity of the whistleblower and other persons named in the report will be maintained throughout the process. The provisions of the Whistleblower Protection Act will apply if the report falls within its scope.

All information is processed by selected and specially trained members of the Compliance Department. They are impartial, independent in carrying out their duties and bound to maintain confidentiality.

### **4. How am I protected as a whistleblower?**

Protecting whistleblowers from retaliation or punishment for making a complaint or providing information is an important part of our whistleblowing process. Attempts at intimidation or retaliation against anyone who, in good faith, reports actual or suspected wrongdoing will not be tolerated.

If you believe you have been subjected to intimidation or retaliation as a result of your report, you should contact Compliance; such intimidation or retaliation will also be investigated in accordance with the procedures outlined above and may result in further investigation.

To the extent that whistleblowers who are employees of one of our direct suppliers are involved, we will seek to enter into appropriate contractual arrangements with the supplier.

### **5. What happens after the submission of my complaint?**

#### **5.1 Receipt of complaint**

Once a report has been received, there will be an internal record of receipt and an acknowledgement of receipt will be sent to the complainant within one week.

#### **5.2 Review of the complaint**

The first step in the compliance process is to determine whether sufficient information is available for the review and investigation of a report.

If this is not the case, the Compliance Department will, if possible, contact the whistleblower to ask for further information. The case will be closed if there is insufficient information or if no contact can be made.

### 5.3 Investigation of the complaint

Compliance will fully investigate the matter or refer it to the appropriate body, e.g. within the company, for investigation, while respecting the principles of confidentiality and data protection. Where necessary, and where possible in the case of anonymous reports, Compliance or the appropriate office will discuss the facts with the whistleblower and may request further information.

### 5.4 Developing a solution

A proposal for further action (in particular, preventive and remedial measures) will be prepared once the investigation is complete and Compliance or the competent body is convinced that a violation has occurred. Where possible and reasonable, the whistleblower will be involved in this process

### 5.5 Implementation and follow-up

Compliance or the responsible body will then follow up on the implementation of the proposed solution.

### 5.6 Completion of the procedure

The processing time varies from case to case and can take anywhere from a few days to several months. However, we will endeavour to complete the investigation in a timely manner.

If contact can be made, the whistleblower will be informed of the outcome of the complaint.

However, it is often not possible to provide detailed information on specific outcomes for data protection reasons.