

Complaint Process – Rules of procedure (Germany)

Below, pursuant to Germany's Supply Chain Due Diligence Act ("LkSG"), we are setting out how we process complaints raised.

1. Area of application

These Rules of Procedure apply to Enterprise Autovermietung Deutschland B.V. Co. KG ("Enterprise Germany" or "We").

2. Object of the complaint

2.1 The complaints procedure enables individuals to draw attention to human rights or environmental risks and violations of human rights or environmental obligations caused by our respective entities' business activities or those of our suppliers. A violation of a protected legal position or human rights or environmental obligation is any behaviour that violates one of the prohibitions listed in Section 2 (2) and (3) LkSG, in particular:

- Prohibition of child labour;
- Prohibition of forced labour and all forms of slavery;
- Disregard for occupational health and safety and work-related health hazards;
- Disregard for freedom of association, freedom of unionisation and the right to collective bargaining;
- Prohibition of unequal treatment in employment;
- Prohibition of withholding an appropriate wage;
- Destruction of the natural basis of life through environmental pollution;
- Unlawful violation of land rights;
- Prohibition of hiring or using private/public security forces that could lead to impairment due to lack of instruction or control;
- The prohibition of an [...] act or omission contrary to duty which is directly capable of impairing a protected legal position (arising from the human rights conventions within the meaning of Section 2 (1) LkSG) in a particularly serious manner and the unlawfulness of which is obvious when all the circumstances in question are reasonably assessed;
- Prohibited production, use and/or disposal of mercury (Minamata Convention);
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs;
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention.

2.2 The complaints procedure enables persons to report misconduct by employees of any our entities or other persons. Misconduct within the meaning of these rules of procedure is any behaviour that violates legal provisions, internal guidelines or company agreements. Misconduct includes in particular:

- Criminal offences, in particular, but not exclusively, in the areas of corruption, competition law, fraud and breach of trust, violation of legally protected secrets, criminal manipulation, money laundering or misuse of data;
- Criminal offences and administrative offences in the areas of environmental protection and occupational safety;
- Attempted and preparatory acts for criminal offences;
- Administrative offences subject to a fine, insofar as the violated regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies;
- Violations of labour law regulations that may justify termination without notice for good cause, in particular violations of Germany's General Equal Treatment Act (AGG), (sexual) harassment and bullying.

2.3 The complaints procedure is not intended to be used to report incidents that exclusively concern the private or intimate sphere of our employees, or obviously minor and legally unobjectionable inconveniences (e.g. deviation from the canteen menu, short-term defect in the coffee machine, inadvertent failure to greet colleagues, etc.). The complaints procedure is also not intended to be used to raise any complaints regarding the functionality of one of our products.

2.4 Complaints should only be made where the whistleblower is in good faith that the facts they have reported are correct. Whistleblowers do not act in good faith if they know that a reported fact is untrue. In cases of doubt, the relevant facts should not be presented as facts, but as assumptions, assessments or statements by other persons.

3. Access to the complaints procedure

3.1 We provide various complaint channels that enable potential whistleblowers to report complaints:

Online: <https://secure.ethicspoint.com/domain/media/de/gui/17305/index.html>

Telephone: 0800-2255-288 (from Germany); then at the prompt dial +1-855-405-4736

3.2 If you are an employee, we encourage you to consider first contacting one of the following individuals:

- Your immediate or next-level supervisor
- Your Human Resources Manager
- Your Compliance and Ethics Committee (see local posters)

3.3 The whistleblower is free to choose which of the various complaint channels to use. The complaints received, regardless of the channel used, will be treated as strictly confidential in accordance with Section 9 of these Rules of Procedure.

3.4 The whistleblower is free to contact the internal or an external reporting centre¹. However, we recommend that the report is first submitted to the internal reporting centre set up within

¹ External reporting centres are, for example Federal Office of Justice, Adenauerallee 9-103, 53113 Bonn (website); Federal Financial Supervisory Authority (BaFin), Whistleblower Reporting Centre, Graurheindorfer Straße 108, 53117 Bonn (website); Federal Cartel Office, Kaiser-Friedrich-Straße 16, 53113 Bonn (website).

the organization so that the report can be followed up as effectively and appropriately as possible. If an internally reported violation has not been remedied, the whistleblower is free to contact an external reporting centre.

4. Content of the complaint

To enable us to investigate the alleged violation or suspected violation and take any necessary action, whistleblowers are encouraged to submit a complaint that includes the following information, to the extent possible:

- Description of the breach or impending breach and the persons/parties involved (specify whether they are employees of ours or external parties);
- Details of the breach or threatened breach, including the relevant times of occurrence;
- Details of any witnesses; and
- Any supporting documents.

5. Responsibility

The Global Compliance & Ethics Department is entrusted with the implementation of the complaints procedure.

6. Multiple complaints

If the whistleblower submits a complaint concerning the same violation or the same impending violation more than once, these will be treated as a single complaint. The same applies if a whistleblower raises a complaint concerning the same violation or the same impending violation in parallel via several of the complaint channels described.

7. Anonymity

When using the "online form" and "telephone" complaints channels, the whistleblower can also submit their complaint anonymously.

8. Procedure of the complaints procedure

- 8.1 The person responsible shall confirm receipt of the complaint to the whistleblower within seven calendar days of receipt of the complaint.
- 8.2 The person responsible evaluates all factual information provided by the whistleblower and carries out a plausibility check and a relevance check. For this purpose, the person responsible may consult with other persons in the organization if this is necessary for the assessment and the persons involved have special expertise, while maintaining the confidentiality of the whistleblower's identity. If the facts on which the complaint is based are unclear or require further clarification/specification, the person responsible will contact the whistleblower (if possible) to discuss the facts and their expectations with regard to possible measures.
- 8.3 If the person responsible concludes that a violation or imminent violation may have occurred, the procedure will be continued. If the person responsible comes to the conclusion that there

is no violation or imminent violation, the complaints procedure is closed and the whistleblower is informed of this and the reasons for it.

- 8.4 If the procedure is continued, a further investigation of the facts will be carried out by the appropriate competent personnel in Business Management; Corporate Compliance and Ethics, Internal Audit, Legal, Human Resources, or local management may be brought in if the topic of the report is relevant to these areas. In the course of this investigation, the person responsible will - if not already done so - contact the whistleblower to discuss the facts underlying the complaint and their expectations with regard to possible measures. In addition, the person responsible may also consult with other persons in the organization if this is necessary for the assessment and the persons involved have special expertise, while maintaining the confidentiality of the whistleblower's identity.
- 8.5 If the person responsible comes to the conclusion that a violation or imminent violation is certain, he or she shall inform the management. The relevant department(s) and the management then jointly determine the preventive and/or remedial measures to be taken. The person responsible then prepares an internal report.
- 8.6 The person responsible shall inform the whistleblower of the outcome or status of the procedure no later than three months after confirmation of receipt of the complaint.
- 8.7 If not already fully implemented prior to notification to the whistleblower, it will be ensured after notification of the whistleblower that preventive and/or remedial measures are fully implemented and checked for their effectiveness and adjusted if necessary. If preventive and/or remedial measures have not yet been completed at the time the whistleblower is notified, the whistleblower will be informed of the results of the measures taken as part of a follow-up notification.

9. Confidentiality and independence

- 9.1 The persons entrusted with the implementation of the complaints procedure are obliged to treat every complaint as strictly confidential and in particular not to disclose the identity of the whistleblower (if known) and all other persons named in the complaint either within or outside the organization. This does not apply in the event of prior written consent to disclosure or in the event of an order or injunction from a competent court or authority requiring disclosure of identity. The identity of persons named in the complaint may also be disclosed if this is necessary in the context of internal investigations or for the taking of follow-up measures.
- 9.2 We respect the confidentiality of the persons entrusted with the implementation of the complaints procedure. Enquiries aimed at revealing the identity of the whistleblower are not permitted. In particular, the persons entrusted with the implementation of the complaints procedure may not be instructed to disclose information about the complaints procedure. They are not subject to any instructions regarding the implementation of the procedure.
- 9.3 The persons entrusted with the implementation of the complaints procedure are obliged to maintain strict impartiality. This means that they must approach the implementation of the complaints procedure impartially. The persons entrusted with the implementation of the complaints procedure are obliged to disclose conflicts of interest immediately. A conflict of interest exists in particular if:
 - The person responsible for conducting the complaints procedure is named in the complaint;

- The person entrusted with conducting the complaints procedure has lodged the complaint themselves;
- The person entrusted with conducting the complaint procedure is the spouse or partner of the whistleblower or of a person named in the complaint;
- The person responsible for conducting the complaints procedure is related to the whistleblower or a person named in the complaint;
- The person responsible for conducting the complaints procedure has a close personal relationship with the whistleblower or a person named in the complaint; or
- The person entrusted with conducting the complaints procedure is to be questioned as a witness as part of the investigation into the facts of the case.

10. Protection of whistleblowers from retaliation and/or discrimination

- 10.1 No whistleblower may be disadvantaged or penalised in any way as a result of a complaint. We guarantee that they will not receive a negative performance appraisal or similar, be warned, dismissed, suspended, transferred, demoted or similar as a result of making their complaint.
- 10.2 Discriminating against or penalising a whistleblower contrary to section 10.1 of these Rules of Procedure is not permitted. Supervisors or employees who nevertheless discriminate against or punish a whistleblower must expect consequences under labour law.
- 10.3 The protection of whistleblowers also applies if the content of a report proves to be unfounded or incorrect. The protection of whistleblowers also applies beyond the conclusion of the complaints procedure.

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