

Code of Procedure of briq for reports to the ombudsperson

I. What is an ombudsperson and who is the ombudsperson of briq?

An ombudsperson is a neutral body that is not part of the institution that has mandated him/her. The ombudsperson has the task of receiving reports concerning violations of the institution's rules. The reporter does not incur any costs or disadvantages by corresponding with the ombudsperson.

briq has mandated the partners of the law firm HEUKING · VON COELLN Rechtsanwälte, Christian Heuking and Dr. Sibylle von Coelln, with the position and role of an ombudsperson. Due to their professional duties, in particular the duty of confidentiality, as well as their experience, both attorneys offer a special guarantee for the professional and secure handling of the respective reports. Reporters are free to choose whom of the two contact persons they wish to reach out to.

II. Who is allowed to contact the ombudsperson?

The ombudsperson can be contacted by briq employees and participants of briq events as well as by third parties who interact with briq and its employees in a professional context.

III. Which matters can be reported?

The ombudsperson will accept reports containing information about potential violations of legal requirements or of the briq Code of Conduct by briq employees or by participants of a briq event. These potential violations must have occurred in connection with or on the occasion of the employee's professional activities or a briq event.

IV. How/through which channel can the report be submitted?

The report can be submitted in person, by mail, by fax, by email, or by phone using the following contact data:

HEUKING · VON COELLN Rechtsanwälte, Prinz-Georg-Str. 104, 40479 Düsseldorf, Germany

Fon: +49 211 44 03 57 71

Fax: +49 211 44 03 57 77

Email: briq-ombudsperson@hvc-strafrecht.de

V. What happens after submitting the report to the ombudsperson?

After receiving the report, the ombudsperson opens a case file and documents the information and further communication in written or digital form.

If the reporter has provided contact details, the ombudsperson will contact the reporter within one week of receiving the report. The ombudsperson confirms receipt of the report, clarifies the facts together with the reporter and gathers the available evidence of the possible misconduct, checks the report prepared in this way for plausibility and makes an initial legal assessment.

If there is sufficient suspicion of a violation of legal regulations or of the briq Code of Conduct and if the reporter has consented, after consultation with the CFO Martin Clemens, the ombudsperson will forward the facts of the case confidentially to an external lawyer who will investigate the facts of the case more closely. Should the accusation of a potential violation be directed at members of the institute's board, this consultation will take place with the President of briq. If the allegation is directed against the President, the Chairman of the Board of Trustees of the Deutsche Post Stiftung, Dr. Hans-Dieter Petram, is the contact person. If there is no sufficiently strong suspicion, the ombudsperson will terminate the proceedings and inform the reporter accordingly.

During the further investigation, the investigating lawyer's contact person within briq is the institute's board only. If the report concerns an alleged behavior of the institute's board or if there is the possibility of a conflict of interest for other reasons, the investigating lawyer's contact person is the President of briq. If the allegation is directed against the President, the Chairman of the Board of Trustees of the Deutsche Post Stiftung is the contact person of the investigating lawyer.

The data of the person filing the report, the data of the persons who are subject to the report, and the data of other persons named in the report may only be disclosed if and to the extent that this is necessary for the investigation or for taking follow-up measures and if the person filing the report has explicitly consented or if there is a legal obligation to forward the report (c.f. par. 138 of the German Criminal Code).

If participants of briq events are subject to a report, the further procedure may be passed on to the respective employer. The procedure can also be handed over to a competent authority (such as an investigating authority).

If and insofar as the reporter requests it, the report will be recorded anonymously and/or will be forwarded anonymously to the investigating lawyer. In these cases, the reporter will remain anonymous towards briq; the identity of the reporter will not be investigated by briq or revealed by the ombudsperson unless required by law.

briq has waived all claims against the ombudsperson for the release of documents arising from the ombudsperson's work. This waiver also applies to documents that the ombudsperson receives from the reporter or that the ombudsperson prepares in connection with the processing of the report.

The investigating lawyer reviews the matter closely, if necessary with the support of his/her contact person within briq and/or the ombudsperson, and informs the ombudsperson about the progress and the result of the investigation. If necessary, the ombudsperson is available as a link between the investigating lawyer and the reporter during the ongoing investigation to receive or obtain further information. In doing so, the ombudsperson also takes into account the legal interests of the persons affected by the report as well as the regulations of data protection.

The investigating lawyer and the institute's board (if they are personally subject to the allegations: the President of briq or the Chairman of the Board of Trustees of the Deutsche Post Stiftung, see above) consult and decide on possible follow-up measures, if necessary supported by the ombudsperson. The agreed follow-up measures are implemented by the institute's board. In particular, measures with regard to labor law may be taken in relation to briq employees whereas participants of briq events may face an exclusion or a barring from events as well as the provision of information to their employer.

The reporter will be informed about the outcome of the investigation within 3 (maximum 6) months, to the extent that is legally permissible.

VI. To what extent is a reporter protected?

The reporter's anonymity is protected if and to the extent that he or she so wishes. The ombudsperson's advice on questions about their status, their rights and the procedure also serves to protect them.

No retaliation or other reprisal may be directed against a reporter based on their report if the reporter had reasonable cause to believe that the information they reported was true and related to violations that may be reported according to this code of procedure.

The same protection shall be granted to persons who confidentially assist the reporter in filing the report if they had reasonable cause to believe that the information reported was true and related to violations that may be reported under this code of procedure.

If a reporter or a person assisting a reporter experiences a disadvantage in connection with their professional activity and claims that he or she suffered this disadvantage as a consequence of a report, it is presumed that this disadvantage is a reprisal for this report. In this case, the person who has disadvantaged the reporter/the person assisting a reporter must prove that the disadvantage resulted from objectively justified reasons and/or was not based on the report.

A reporter who deliberately submits a false report is not protected. On the basis of and with regard to their report, they will have to face consequences with regard to labor law, tort law and, if applicable, criminal law even if they had wished their identity to be protected.