

RULES OF PROCEDURE FOR COMPLAINTS

Introduction

BCG is pleased to incorporate the following Rules of Procedure into its [Speak Up](#) Line platform.

With the publication of these Rules, our goal is to increase transparency and accessibility for our reporting processes.¹

Through the Speak Up Line, BCG provides potentially affected persons inside and outside of BCG with effective and accessible ways to report their complaints. All complaints will be handled in a fair, confidential, and transparent manner.

The complaint procedure is described in the following Rules of Procedure for Complaints.

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These Rules of Procedure for Complaints apply to BCG Germany and all its affiliated companies.

¹ Publication of the Rules of Procedure for Complaints satisfies the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) (“LkSG”) requirements.

RULES OF PROCEDURE FOR COMPLAINTS

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Rules of Procedure for Complaints

1. Introduction: BCG's Rules of Procedure

The purpose of the Rules of Procedure is to provide clarity as to how BCG's complaint procedure operates. BCG operates a corporatewide, transparent, publicly available, accessible, and standardized complaint procedure, the Speak Up Line, in accordance with the following Rules of Procedure for Complaints. All complaints from employees or third parties are treated similarly insofar as it is legally permitted.

2. Who can submit complaints?

Anyone. The complaint procedure is open to all BCG employees, external persons, and other organizations.

3. What can I report?

Any individual can quickly and easily report concerns about actual or suspected misconduct that may be in breach of our values. Reportable concerns could include breaches of our [Code of Conduct](#) and [Supplier Code of Conduct](#), violations of the law including issues relating to bribery and corruption, and risks or violations relating to human rights and the environment as specified in the LkSG and other laws. The Speak Up Line must not be used to make false accusations against others or to report deliberately untrue information. Further details are provided under the Speak Up Line's [Reportable Offenses](#).

4. Do I have various options for submitting complaints?

Yes. BCG has a dedicated reporting channel for complaints. Complaints can be submitted via the Speak Up Line 24 hours a day, 7 days a week, in writing or via audio recording in an individual's chosen language. Regardless of how the complaint is submitted, individuals using the line may choose to remain anonymous. The Speak Up Line is available in over 200 different languages and is managed by BCG. The content of the complaints is processed exclusively by BCG.

5. Who will investigate my complaint?

BCG's Global Employee Relations (Global ER) team receives and manages complaints made to the Speak Up Line. The Global ER team reports directly to BCG's Head of Human Resources, who has access to BCG's Managing Directors and Partners, as well as BCG's Global Chief Compliance Officer, Supplier Governance Forum, and the Executive Committee.

Further support for complaints evaluation and investigation specific to supplier issues is provided through the Supplier Risk Management team which reports to the Supplier Governance Forum.

The BCG Human Rights Officer provides additional oversight, and BCG's internal or external legal advisors will be involved, the extent of which involvement will depend on the specifics of the Complaint.

Employees responsible for the Complaints Procedure, including but not limited to, the Human Rights Officer, the Global ER team, the Legal team, and the Supplier Risk Management team, are subject to a special duty of confidentiality, are impartial, and have the necessary expertise to professionally handle complaints. BCG may contact you if additional information is needed, and in some instances, such as under the LkSG, BCG may need to discuss your complaint with you. The anonymous reporting feature of the Speak Up Line means individuals need not leave contact information. As specified below, they can instead choose to create a login to the portal, ensuring they remain anonymous.

All communication with us is anonymous if you wish it to be.

- 1. We ask that you open a secure inbox whether you choose to remain anonymous or provide your name. The Secure Inbox is where we will communicate with you to ask for additional information and provide updates to your inquiry or concern. Please note that the Secure Inbox is managed on a separate platform and not on BCG.com.*
- 2. When you create a Secure Inbox, you will be given a case number, and you will choose a password. You will use the case number and password to log in to the Secure Inbox to see if you have received any questions.*

3. *We recommend that you monitor the Secure Inbox after submitting an inquiry or concern in case additional information is needed or updates are available. We may not be able to finalize the case without further information from you.*

6. Will BCG keep my identity confidential?

Yes. All complaints may be submitted anonymously, and BCG takes great care to protect you as a reporter and ensure your complaint is kept confidential.

7. Will I be informed that my complaint is being processed?

Yes. Within no more than seven days of receipt of your complaint, you will receive an acknowledgement of receipt from BCG via the Secure Inbox.

8. Will all complaints be processed?

We take all complaints seriously. The Global ER team examines each complaint to clarify whether there is sufficient information to process the matter. We may request additional information from you to evaluate the claim and the investigation will necessarily be limited by the information provided.

9. What happens to my complaint once it has been examined?

After the Global ER team examines your complaint, it may forward it to the appropriate teams for further evaluation and investigation. For supplier-related complaints, the Global ER team may incorporate the Supplier Risk Management team's expertise to investigate through BCG-designated specialists for further handling and fact finding. During the investigation, the Supplier Risk Management team may review relevant documents, speak with witnesses and affected parties, and, if necessary, analyze electronic data. At the end of the fact-finding process, the results will be summarized in a report that is distributed to relevant decisionmakers. Possible outcomes for confirmed cases include recommendations for disciplinary or remedial action such as risk management, action plans, and internal process measures. Insofar as is possible and legally permissible, we will inform you of the status of the complaint within three months of the measures taken.

10. Are there rules in place for fact finding?

Yes. All BCG employees who are involved in fact finding must adhere to certain rules of conduct, including:

- *All fact finding will be performed respectfully, objectively, and without any presumption.*
- *Employees or third parties implicated by a complaint have the right to be heard.*
- *As set out in Number 6 above, complaint data, information, and details will be treated confidentially to the extent practicable on a need-to-know basis and consistent with legal requirements.*

- *If any person engaged in fact finding has a potential or actual conflict of interest, that fact finder will recuse themselves from the matter.*
- *As set out Number 11 below, the person reporting the complaint will be protected to the extent possible.*

11. Am I protected if I report a complaint?

Yes. BCG will not tolerate retaliation of any kind against its employees, as set forth in the [Code of Conduct](#), against its suppliers, through its [Supplier Code of Conduct](#), or against persons who in good faith submit complaints. If you believe you or anyone else has been retaliated against or in any way has been treated differently for submitting a complaint in good faith, you should inform BCG immediately. We follow up on all plausible allegations of retaliation or mistreatment. Appropriate disciplinary action, up to and including termination, will be taken in response to substantiated acts of retaliation.

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