

WBA Audit Committee Complaint Procedures

(as approved in January 2021)

Pursuant to the Sarbanes-Oxley Act of 2002, the WBA Audit Committee Charter and the WBA Audit Committee Complaint Policy for Accounting and Auditing Matters, the WBA Audit Committee has established the following procedures for: (i) for the receipt, retention and treatment of Complaints regarding accounting, internal accounting controls, or auditing matters; and (ii) the confidential and, if needed, anonymous submission by WBA employees of concerns regarding questionable accounting or auditing matters.

- 1. Employees and other individuals may communicate Complaints on a confidential or anonymous basis either through third party telephone whistleblowing lines or third party websites that WBA has established in the countries in which it operates and that are also made available on the WBA website.
- 2. All Complaints regarding accounting, internal controls or auditing matters received will be sent directly to the WBA Global Chief Compliance and Ethics Officer. If the WBA Global Chief Compliance and Ethics Officer is the subject of the complaint, that complaint should be routed to the WBA Vice President, Global Internal Audit.
- 3. The WBA Global Chief Compliance and Ethics Officer will prepare and distribute a quarterly summary of Complaints to the WBA Audit Committee.

Any Complaints regarding accounting, internal controls or auditing matters which could in the judgement of the WBA Global Chief Compliance and Ethics Officer have a material adverse financial or reputational consequence on WBA or that specifically name an executive officer of WBA will be reported immediately to the WBA Audit Committee Chair.

The WBA Audit Committee may retain outside counsel or other advisers to perform or assist in investigations of any complaint addressed to it.

WBA will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of Complaints regarding accounting matters or otherwise.

CONTACT INFORMATION FOR COMPLAINTS TO THE WBA AUDIT COMMITTEE OR BOARD OF DIRECTORS

Please choose one of the options listed below to report Complaints about WBA's accounting, internal controls or auditing matters or other concerns to the WBA Audit Committee or Board of Directors:

Phone Calls: 1-855-924-2633



Written Complaints to the WBA Audit Committee or Board of Directors: 108 Wilmot Road
MS #1858
Deerfield, IL 60015

Email Complaints to the WBA Audit Committee or Board of Directors: wba.ac.complaint.mailbox@wba.com

- All Complaints will be received, administered and reviewed by the WBA Global Chief Compliance and Ethics Officer.
- Complaints related to WBA's accounting, internal controls or auditing will be shared with the Chair of the WBA Audit Committee.
- When possible, WBA will acknowledge receipt of your complaint or concern.
- You can report your complaint or concern confidentially or anonymously without fear of retaliation.