

DR. AUGUST OETKER KG



## Rules of procedure

Reporting- and complaints procedure (hereinafter:  
whistleblowing procedure)

## 1. Preface

Ethical and lawful conduct is a top priority for the Oetker Group (for a listing of Oetker Group companies, see Annex 1) in its own business activities and in its relationships with all business partners and customers.

The Oetker Group has established a whistleblowing procedure that allows individuals, companies and other organisations to report violations of applicable law (e.g. bribery, fraud, violation of human rights and environmental regulations), of the Oetker Group's internal policies (e.g. Code of Conduct) or of the Oetker Group's Supplier Code of Conduct, or concerns regarding a potential or actual violation of these regulations.

The whistleblowing procedure is intended to ensure that all incoming tips are investigated and processed in a transparent and fair manner.

## 2. Reporting person

The whistleblowing procedure is open to anyone who wishes to point out wrongdoing caused by the economic activities of the Oetker Group or a direct or indirect supplier of the Oetker Group. Information can be reported by the reporting person who is himself directly or indirectly affected (self-affected reporting person) or by the reporting person who is not himself affected (informing reporting person).

## 3. Free of charge

The whistleblowing procedure is free of charge for the reporting person.

## 4. Available reporting channels

The reporting person can submit a notice via the whistleblowing procedure at any time through various channels.

The available reporting channels are:

- Reports via the [Compliance-Hotline](#)
- Reports by e-mail to [compliance@oetker-group.com](mailto:compliance@oetker-group.com)
- Reports by letter to:  
*Dr. August Oetker KG*  
*Corporate Compliance Committee*  
*Lutterstraße 14*  
*33617 Bielefeld*  
*Germany*

- Telephone messages to:  
00800-911 911 00      Universal International Freephone Number (UIFN)  
Country-specific toll-free phone number:
  - India: +91-1800-1213614
  - Mexico: +52-800-4610637
  - Serbia: +381-800-800688
  - Ukraine: +380-800-800186
- Reports by employees of the Oetker Group to the management, the supervisor, the (Group) Compliance Officer or other designated contact persons of the respective subsidiary (e.g. in the context of a personal interview) and, in the case of SCDDA relevance, the designated Human Rights Coordinator or Human Rights Officer.

## **5. Protection of the reporting person**

### **a) Protection from disadvantage or punishment**

The Oetker Group guarantees appropriate and effective protection for the reporting person from disadvantage or punishment. This applies if and insofar as the reporting person providing the information did so in good faith, i.e. if the person providing the information had reasonable grounds to believe that the information contained in the notice was truthful. The protection of the reporting person can only be guaranteed to the extent that the legal influence of the Oetker Group extends.

The Oetker Group does not permit any culture of accusation, stigmatisation or prejudice and will support and protect affected persons. In the event of demonstrably knowing disclosure of false and/or misleading information (e.g. knowingly false suspicion), the Oetker Group reserves the right to consider disciplinary and/or civil or criminal action.

### **b) Maintaining confidentiality and identity**

The Oetker Group shall ensure that the identity of the reporting person and any third parties named in the report is protected and that unauthorised employees do not have access to it. The reporting person shall not suffer any disadvantages as a result of making use of the whistleblowing procedure. The Oetker Group offers the possibility of anonymous reporting.

Information on identity may be disclosed to the competent authorities if this is necessary due to a legal obligation or a court or official order and if there is sufficient suspicion of a criminal offence.

## **6. Responsibility and independence from professional instructions, impartiality and expertise of the persons conducting the proceedings**

The individuals entrusted with the complaints procedure are the Compliance Organisation / the designated Compliance Officers and, in the case of SCDDA relevance, the responsible Human Rights Officers and Human Rights Coordinators. The Oetker Group ensures that the persons entrusted with the implementation of the whistleblowing procedure act impartially, are independent and are not bound by professional instructions. Furthermore, the Oetker Group ensures that the individuals entrusted with conducting the whistleblowing procedure are competent.

## **7. Possible additional information when reporting a notice**

The circumstances should be described as precisely as possible. The more information a note contains, the more efficient the processing can be. For example, the following information can be helpful:

- What exactly happened?
- When or in what period did the incident occur or is the incident continuing?
- Where did the incident occur (e.g. in which country, in which production facility, at which supplier)?
- Who are the people involved?
- How many people are affected?
- Are you also affected?
- Which other persons have become aware of the incident?
- Is there any immediate danger to life and health?
- Has the risk or violation been reported to the Oetker Group before?
- If so, have measures been initiated to minimise or eliminate the risk or violation?

## **8. Processing of the incoming notices**

All notices received are carefully examined and processed by the Oetker Group. As a general rule, the processing takes place in the following steps:

### **a) Contacting or communicating with the reporting person**

To the extent necessary (e.g. to clarify the circumstances) and to the extent possible (depending on the reporting channel), the Oetker Group may contact and communicate with the reporting person. In the case of anonymous whistleblowing, contact or communication is generally only possible if the notice has been received via the reporting system. In these cases, contact or communication is made via the reporting system while maintaining anonymity.

### **b) Confirmation of receipt**

The reporting person will receive confirmation of receipt of the notice within seven days. The confirmation of receipt is sent via the same reporting channel through which the tip was originally reported. If a confirmation of receipt is not possible due to the reporting channel chosen by the reporting person (e.g. anonymous letter), the Oetker Group shall not be obliged to send a confirmation of receipt.

### **c) Examination of the notice**

If the Oetker Group determines in the course of the investigation that the report is justified, it will take appropriate preventive and/or remedial actions.

If the notice is unfounded, the Oetker Group will discontinue the proceedings. A notice is unfounded, for example, if the facts from the notice report are not confirmed, if no violation of applicable law or internal guidelines of the Oetker Group has been established or if a notice has no connection with the Oetker Group or its business partners.

### **d) Information on the outcome of the whistleblowing procedure**

The reporting person will receive a notification of the progress of the notice within three months of the confirmation of receipt. The reporting person will also be informed, if possible, if the proceedings have been discontinued due to the unfoundedness of the notice.

However, information may only be provided insofar as this does not impair legally protected interests, in particular internal enquiries or investigations or the rights of the persons who are the subject of a whistleblowing report or who are named in the whistleblowing report. The duty to inform is not required in cases where it is not possible to contact the reporting person due to the reporting channel chosen by the reporting person.

## **9. External reporting platforms**

The reporting person also has the option of submitting an external notification to the responsible authorities, institutions or other bodies of the Federation, the States or the European Union. In particular, the following can be considered:

- the central external reporting office of the Federal Office of Justice
- the whistleblowing system of the Federal Financial Supervisory Authority
- the whistleblowing system of the Federal Cartel Office

## **Annex 1**

The Oetker Group comprises the following business divisions:

- Dr. August Oetker KG
- Food Division - Dr. Oetker
- Food Division - Conditorei Coppenrath & Wiese
- Beer and Non-Alcoholic Beverages Division - Radeberger Gruppe
- Business division Other Interests - Flaschenpost SE
- Business division Other Interests - Oetker Hotels
- Business division Other Interests - Handelsgesellschaft Sparrenberg
- Business division Other Interests - OEDIV
- Business division Other Interests - Roland Transport
- Business divisions Other Interests - Oetker Digital

*Note: The update of this annex takes place annually*