

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
- 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

DR. AUGUST OETKER KG



Fitsipika momba ny fomba fiasa

Ny fomba fitaterana sy fitarainana (eto ambany: fomba fiasa)

1. Teny fampidirana

Ny fitondran-tena ara-moraly sy ara-dalàna dia laharam-pahamehana ho an'ny vondrona Oetker (ho an'ny lisitr'ireo orinasa Oetker Group, jereo ny Appendix 1) amin'ny asa aman-draharahany manokana sy amin'ny fifandraisany amin'ny mpiara-miasa sy mpanjifa rehetra.

Ny Oetker Group dia nametraka fomba fiasa fanairana izay ahafahan'ny tsirairay, orinasa ary fikambanana hafa hitatitra ny fanitsakitsahana ny lalàna azo ampiharina (ohatra: kolikoly, hosoka, fanitsakitsahana ny zon'olombelona sy ny fitsipika momba ny tontolo iainana), ny politika anatin'ny ao amin'ny Oetker Group (ohatra ny Code of Conduct) na ny Code of Conduct an'ny Oetker Group, na ahiahy momba ny mety ho fanitsakitsahana na tena fanitsakitsahana ireo fitsipika ireo.

Ny tanjon'ny fomba fiasa amin'ny mpampita vaovao dia ny hahazoana antoka fa ny fampahalalana rehetra voaray dia averina jerena sy karakaraina amin'ny fomba mangarahara sy tsy mitanila.

2. Mpitatitra

Misokatra ho an'izay rehetra te-hitatitra ny tsy mety vokatry ny hetsika ara-toekarenan'ny Vondrona Oetker na mpamatsy mivantana na ankolaka ny Vondrona Oetker ny fomba fanaovana ampamoaka. Ny fampahalalana dia mety omen'ny mpanambara izay voakasika mivantana na ankolaka (fanambarana ny tenany) na avy amin'ny mpanambara izay tsy voakasika (manambara ny tatitra).

3. Maimaim-poana

Maimaim-poana ho an'ilay olona mampihatra azy ny fomba fibitsihana.

4. Fantsona tatitra azo ampiasaina

Ny olona izay iharan'ny tatitra dia afaka manao izany amin'ny alalan'ny fomba fanaovana fanairana amin'ny fotoana rehetra sy amin'ny alalan'ny fantsona samihafa.

Ireto fantsona manaraka ireto dia azo jerena:

- Tatitra amin'ny alalan'ny [Compliance-Hotline](#)
- Tatitra amin'ny alalan'ny mailaka ao amin'ny compliance@oetker-group.com
- Tatitra amin'ny alalan'ny taratasy ho an'ny adiresy manaraka

*Dr. August Oetker KG
Corporate Compliance Committee
Lutterstraße 14
33617 Bielefeld
Germany*

- Hafatra an-tariby ho an'ny:

00800-911 911 00 Laharana finday maimaim-poana iraisam-
pirenena (UIFN) ao amin'ny firenena:

- o India : +91-1800-1213614
- o Mexique : +52-800-4610637
- o Serbia : +381-800-800688
- o Ukraine : +380-800-800186

- Tatitra avy amin'ny mpiasan'ny Oetker Group amin'ny fitantanana, mpanara-maso, (vondrona) na olona hafa voatondro ifandraisana amin'ny zana-tsampan'ny tsirairay (ohatra amin'ny resadresaka manokana) ary, raha ny maha-zava-dehibe ny SCDDA, amin'ny mpandrindra ny zon'olombelona na ny tompon'andraikitra voatendry ho an'ny zon'olombelona.

5. Fiarovana ny fanambarana

a) Fiarovana amin'ny tsy fahampiana na sazy

Ny vondrona Oetker dia miantoka ny fiarovana sahaza sy mahomby ny olona izay nanome ny vaovao amin'ny fahavoazana na ny sazy. Mihatra izany raha toa ka nanao izany tamim-pahamarinana ilay olona nanome ny vaovao, izany hoe raha toa ka manana antony marim-pototra ny olona manome ny vaovao mba hino fa marina ny fampahalalana voarakitra ao amin'ilay fanambarana. Ny fiarovana ny fanambarana dia tsy azo antoka raha tsy amin'ny fanitarana ny hery ara-dalàna ataon'ny vondrona Oetker.

Tsy mamela ny kolontsainan'ny fiampangana, ny fanilikilihana na ny fitsarana an-tendrony ny Vondrona Oetker ary hanohana sy hiaro ireo niharam-boina. Raha toa ka minia mamoka vaovao diso sy / na mamitaka (ohatra ny fiahahiana diso fanta-daza), ny vondrona Oetker dia manana zo handinika ny fepetra famaizana sy/na sivily na heloka bevava.

b) Fitazonana ny tsiambaratelo sy ny maha-izy azy

Ny vondrona Oetker dia miantoka fa voaaro ny mombamomba ilay mpampita vaovao sy ireo antoko fahatelo voalaza ao amin'ny mpampita vaovao ary tsy afaka miditra amin'izany ireo mpiasa tsy nahazo alalana. Ny olona manao ny tatitra dia tsy tokony hiaritra ny tsy fahampiana vokatry ny fampiasana ny fomba fitsikerana. Ny vondrona Oetker dia manolotra ny fahafahana manao tatitra tsy mitonona anarana.

Ny fampahalalana momba ny maha-izy azy dia azo ambara amin'ny manam-pahefana manam-pahefana raha ilaina izany noho ny adidy ara-dalàna na ny baikon'ny fitsarana na ny manampahefana ary raha ampy ny ahiahiana ho nanao heloka bevava.

6. Ny fandraisana andraikitra sy ny fahaleovantena amin'ny torolalana matihanina, ny tsy fivadihana ary ny fahaiza-manaon'ireo izay tafiditra amin'ny dingana

Ireo olona tompon'andraikitra amin'ny dingana fitoriana dia ireo voatendry ho tompon'andraikitra amin'ny fanarahan-dalàna/fanarahana ny lalàna ary, raha ny maha-zava-dehibe ny SCDDA, ireo tompon'andraikitra misahana ny zon'olombelona sy ireo mpandrindra ny zon'olombelona. Ny vondrona Oetker dia miantoka fa ireo tompon'andraikitra amin'ny fampiharana ny fomba fiasa amin'ny alalan'ny fanambarana tsy misy fivadihana, dia mahaleo tena ary tsy voafehy amin'ny toromarika matihanina.

Ankoatr'izay, ny vondrona Oetker dia miantoka fa ireo olona tompon'andraikitra amin' ny fanatanterahana ny fizotran'ny fampandrenesana dia mahay.

7. Fampahalalana fanampiny azo atao rehefa manao famerenana

Ny toe-javatra dia tsy maintsy faritana araka izay azo atao. Arakaraka ny fanazavana bebe kokoa ny naoty misy, ny mahomby kokoa ny fanodinana. Ohatra, ireto fampahalalana manaraka ireto dia mety hanampy:

- Inona marina no nitranga?
- Oviana na oviana no nitrangan'ny loza na mbola mitohy?
- Aiza no nitrangan'ny tranga (ohatra, firenena inona, aiza no misy ny toeram-pamokarana, iza no mpamatsy)?
- Iza no voakasika amin'izany?
- Firy ny olona miahiahy?
- Manahy ihany koa ve ianao?
- Iza koa no mahalala ny zava-nitranga?
- Loza mitatao ho an'ny fahasalaman'ny tena sy ny fiainana ve izany?
- Efa notaterina tamin'ny vondrona Oetker ve ny loza na ny fanitsakitsahana?
- Raha izany no izy, moa ve nisy fepetra noraisina mba hampihenana na hanafoanana ny loza na ny fandikan-dalàna?

8. Fikarakarana Narahi-baovao

Ny fampandrenesana rehetra voaray dia nodinihina sy nokarakarain'ny Oetker Group. Amin'ny ankapobeny, ny fitsaboana dia mitranga araka ireto dingana manaraka ireto:

a) Mifandraisa na mifandray amin'ilay olona manao ny tatitra.

Raha ilaina (ohatra ny fanazavana ny toe-javatra) sy araka izay azo atao (miankina amin'ny fantsona tatitra), ny Oetker Group dia afaka mifandray sy mifandray amin'ny olona nanao ny tatitra. Raha misy tatitra tsy mitonona anarana, ny fifandraisana na ny fifandraisana dia matetika tsy azo atao raha toa ka voaray tamin'ny alalan'ny rafitra fampandrenesana ny fampahafantarana. Amin'ity tranga ity, ny fifandraisana na ny fifandraisana dia atao amin'ny alalan'ny rafitra tatitra sady mitazona ny tsy fitononana anarana.

b) Fanekena ny fandraisana

Ny fampahafantarana dia hahazo fankatoavana ny fandraisana ny fampandrenesana ao anatin'ny fito andro. Nalefa tamin'ny alalan'ny fantsona fitateram-baovao izay nitaterana ny fanairana tany am-boalohany ny fankatoavana. Raha toa ka tsy azo atao ny fanekena ny fandraisana noho ny fantsombaovao nofidian'ny mpisoratra anarana (ohatra taratasy tsy mitonona anarana), dia tsy voatery handefa fankatoavana ny fandraisana ny vondrona Oetker.

c) Examen de l'avis

Raha mamaritra ny vondrona Oetker, mandritra ny fanadihadiana, fa voamarina ny tatitra, dia handray fepetra fisorohana sy/na fanitsiana mifanaraka amin'izany.

Raha tsy marim-pototra ny hevitra, dia hamarana ny dingana ny vondrona Oetker. Ny

fampahafantarana dia tsy marim-pototra, ohatra, raha toa ka tsy voamarina ny zava-misy momba ny tatitra fampandrenesana, raha tsy misy ny fanitsakitsahana ny lalàna azo ampiharina na ny torolàlana anatin'ny vondrona Oetker na raha tsy misy fifandraisana amin'ny vondrona Oetker na ny mpiara-miasa amin'ny fampahafantarana.

d) Fampahalalana momba ny vokatry ny fomba fiasa amin'ny alàlan'ny fampandrenesana

Ny lohahevitra momba ny angon-drakitra dia hahazo fampahafantarana ny satan'ny fanehoan-kevitra ao anatin'ny telo volana aorian'ny fanamafisana ny fandraisana azy. Ny olona voakasik'izany dia hampahafantarina ihany koa, araka izay azo atao, raha toa ka najanona ny fomba fiasa noho ny tsy fisian'ny foto-kevitra.

Na izany aza, ny fampahalalana dia azo omena raha tsy manavakavaka ny tombontsoa arovana aradala, indrindra ny fanadihadiana anatin'ny na ny zon'ireo olona izay iharan'ny tatitra na iza na iza voatonona ao amin'ny tatitra. Tsy takiana amin'ny tranga izay tsy azo atao ny mifandray amin'ilay olona nanao ny tatitra noho ny fantsom-pampahalalam-baovao nofidiany.

9. Sehatra fampahalalana ivelany

Ny olona mpanao tatitra ihany koa dia manana safidy handefa fampahafantarana avy any ivelany any amin'ny manampahefana, andrim-panjakana na sampana tompon'andraikitra hafa ao amin'ny Federasiona, ny Fanjakana na ny Vondrona Eoropeana. Ireto singa manaraka ireto dia azo raisina:

- Biraon'ny Fampahalalam-baovao Ivelany ao amin'ny Biraon'ny Fitsarana Federaly
- Accueil Société Mpanara-maso ara-bola ny Banky iraisam-pirenena
- Ny rafitra fanairana ao amin'ny Biraon'ny Cartel Federaly

Fanazavana fanampiny 1

Ny vondrona Oetker dia ahitana ireto fizarana manaraka ireto:

- Dr. August Oetker KG
- Sampana Sakafo - Dr. Oetker
- Division alimentaire - Conditorei Coppenrath & Wiese
- Beer & Non-alcoholic Drinks Division - Radeberger Gruppe
- Business Line: Tombontsoa hafa - Flaschenpost SE
- Fizarazarana ara-barotra hafa mahaliana - Oetker Hotels
- Sehatry ny indostria Tombontsoa hafa - Handelsgesellschaft Sparrenberg
- Ny tombotsoan'ny orinasa hafa - MVBDA
- Ny tombontsoa hafa amin'ny indostria - Roland Transport
- Fizarazarana ara-barotra hafa mahaliana - Oetker Digital

Fanamarihana: Ity fanavaozana ity dia havaozina isan-taona.