

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



议事规则

举报和投诉程序（以下简称：举报程序）

1. 序言

道德和合法行为是欧特克集团（欧特克集团公司名单见附件 1）在自身业务活动以及与所有业务伙伴和客户关系中的首要任务。

欧特克集团制定了举报程序，允许个人、公司和其他组织举报违反适用法律（如贿赂、欺诈、违反人权和环境法规）、违反欧特克集团内部政策（如行为准则）或欧特克集团供应商行为准则的行为，或对可能或实际违反这些法规的行为表示担忧。

举报程序旨在确保以透明和公平的方式调查和处理所有举报。

2. 报告人

任何人都可以通过举报程序指出欧特克集团或欧特克集团直接或间接供应商的经济活动所造成的不法行为。信息可以由直接或间接受到影响的举报人（自受影响的举报人）或未受影响的举报人（告知举报人）进行举报。

3. 免费

举报程序对举报人免费。

4. 可用的报告渠道

举报人可通过各种渠道随时通过举报程序提交通知。

可用的报告渠道有

- 通过[合规热线](#)进行报告
- 通过电子邮件将报告发送至 compliance@oetker-group.com
- 致函报告：

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

- 电话留言

00800-911 911 00 通用国际免费电话号码 (UIFN) 各国专用免费电话

号码：

印度：+91-1800-1213614

墨西哥：+52-800-4610637

塞尔维亚：+381-800-800688

乌克兰：+380-800-800186

- 欧特克集团员工向管理层、主管、（集团）合规专员或各子公司的其他指定联系人报告（例如，在个人面谈的情况下），如果与 SCDDA 有关，则向指定的人权协调员或人权专员报告。

5. 保护举报人

a) 保护免受不利或惩罚

欧特克集团保证为举报人提供适当和有效的保护，使其免受不利或惩罚。如果举报人提供信息是出于善意，即提供信息的人有合理的理由相信通知中的信息是真实的，那么这一点就适用。对举报人的保护只能在欧特克集团的法律责任范围内得到保证。

欧特克集团不允许任何指责、侮辱或偏见的文化，并将支持和保护受影响的人。如果在明显知情的情况下披露了虚假和/或误导性信息（如故意的虚假怀疑），欧特克集团保留考虑采取纪律处分和/或民事或刑事诉讼的权利。

b) 维护保密性和身份

欧特克集团应确保举报人和举报中提到的任何第三方的身份受到保护，未经授权的员工不得接触举报人和举报中提到的任何第三方。举报人不得因使用举报程序而遭受任何损失。欧特克集团提供匿名举报的可能性。

如果出于法律义务或法院或官方命令的需要，以及有足够的刑事犯罪嫌疑，可向主管当局披露身份信息。

6. 进行诉讼的人员的独立性和公正性和专业技能

被委托执行举报程序的人员是合规组织/指定的合规专员，如果与 SCDDA 有关，则是负责的人权专员和人权协调员。欧特克集团确保负责执行举报程序的人员公正、独立，不受专业指令的约束。此外，欧特克集团还确保被委托执行举报程序的人员是称职的。

7. 报告通知时可能提供的补充信息

应尽可能准确地描述具体情况。说明中包含的信息越多，处理效率就越高。例如，以下信息可能会有所帮助：

- 到底发生了什么？
- 事件发生在何时或哪个时期，或事件是否仍在继续？
- 事件发生在哪里（例如在哪个国家、哪个生产设施、哪个供应商）？
- 有哪些相关人员？
- 有多少人受到影响？
- 您是否也受到影响？
- 还有哪些人知道这一事件？
- 是否会立即危及生命和健康？
- 以前是否向欧特克集团报告过风险或违规行为？
- 如果是，是否已采取措施尽量减少或消除风险或违规行为？

8. 处理收到的通知

欧特克集团会对收到的所有通知进行仔细审查和处理。一般来说，处理步骤如下：

a) 与举报人联系或沟通

在必要的范围内（例如，为了澄清情况）和可能的范围内（取决于举报渠道），欧特克集团可以与举报人联系和沟通。在匿名举报的情况下，一般只有在通过举报系统收到举报后才有可能进行联系或沟通。在这种情况下，在保持匿名的前提下，通过举报系统进行联系或沟通。

b) 确认收货

举报人将在七天内收到收到通知的确认函。收件确认函将通过最初举报的同一举报渠道发送。如果由于举报人选择的举报渠道（如匿名信）而无法进行收件确认，则欧特克集团没有义务发送收件确认函。

c) 审查通知

如果在调查过程中，欧特克集团认定举报属实，将采取适当的预防和/或补救措施。

如果通知毫无根据，欧特克集团将终止诉讼程序。例如，如果通知报告中的事实没有得到证实，如果没有违反适用法律或欧特克集团的内部准则，或者如果通知与欧特克集团或其商业伙伴没有任何关系，那么通知就是没有根据的。

d) 关于举报程序结果的信息

举报人将在确认收到通知后的三个月内收到通知的进展情况。如果可能，还将告知举报人诉讼是否因通知毫无根据而中止。

然而，只有在不损害受法律保护的利益，特别是不损害内部查询或调查，或不损害作为 举报对象或在举报中被点名的人的权利的情况下，才可提供信息。如果由于举报人选择的举报渠道而无法与举报人取得联系，则无需履行告知义务。

9. 外部报告平台

报告人还可以选择向联邦、国家或欧盟的主管当局、机构或其他机关提交外部通知。特别是可以考虑以下情况：

- 联邦司法办公室的中央外部报告办公室
- 联邦金融监管局的举报系统
- 联邦卡特尔办公室的举报系统

附件 1

欧特克集团由以下业务部门组成：

- Dr. August Oetker KG
- 食品部 - Dr. Oetker
- 食品部 - Conditorei Coppenrath & Wiese
- 啤酒和无酒精饮料部 - Radeberger Gruppe
- 业务部门 其他权益 - Flaschenpost SE
- 业务部门 其他权益 - Oetker 酒店
- 业务部门 其他权益 - 斯帕伦贝格手工业公司
- 业务部门 其他权益 - OEDIV
- 业务部门 其他权益 - 罗兰运输公司
- 业务部门 其他兴趣爱好 - Oetker Digital

注：本附件每年更新一次