

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



Poslovník

Postopek prijave in pritožbe (v nadaljnjem besedilu: postopek prijave nepravilnosti)

1. Predgovor

Etično in zakonito ravnanje je glavna prednostna naloga skupine Oetker (za seznam družb skupine Oetker glej Prilogo 1) pri njenih poslovnih dejavnostih ter poslovanju z vsemi poslovnimi partnerji in strankami.

Skupina Oetker je uvedla postopek prijavljanja nepravilnosti, ki posameznikom, podjetjem in drugim organizacijam omogoča prijavo kršitev veljavne zakonodaje (npr. korupcije, goljufije, kršitve človekovih pravic in okoljskih predpisov), notranjih politik skupine Oetker (npr. kodeksa ravnanja) ali kodeksa ravnanja za dobavitelje skupine Oetker, ali pomisleke glede morebitne ali dejanske kršitve teh predpisov.

Cilj postopka za žvižgače je zagotoviti, da se vse prejete informacije pregledajo in obdelajo na pregleden in pošten način.

2. Poročevalec

Postopek prijave nepravilnosti je odprt za vsakogar, ki želi prijaviti nezakonito ravnanje, ki je posledica gospodarskih dejavnosti skupine Oetker, ali neposrednega ali posrednega dobavitelja skupine Oetker. Informacije lahko zagotovi deklarant, ki je neposredno ali posredno prizadet (samododeljeni deklarant), ali deklarant, na katerega to ne vpliva (prijavitelj).

3. Brezplačno

Postopek prijave nepravilnosti je za osebo, ki ga izvaja, brezplačen.

4. Razpoložljivi kanali za prijavo

Oseba, ki je predmet prijave, lahko to stori v postopku prijave nepravilnosti kadar koli in prek različnih kanalov.

Na voljo so naslednji kanali za prijavo:

- Poročanje prek [Dežurna telefonska številka za skladnost s predpisi](#)
- Poročila po elektronski pošti na compliance@oetker-group.com
- Poročila po pošti na naslednji naslov:
*Dr. August Oetker KG
Corporate Compliance Committee
Lutterstraße 14
33617 Bielefeld
Germany*

- Telefonska sporočila na naslov:
00800-911 911 00 Univerzalna mednarodna brezplačna telefonska številka (UIFN) Brezplačna telefonska številka, specifična za državo:
 - Indija : +91-1800-1213614
 - o Mehika : +52-800-4610637
 - o Srbija: +381-800-800688
 - o Ukrajina : +380-800-800186
- poročila zaposlenih v skupini Oetker vodstvu, nadzorniku, pooblaščenca za skladnost (skupine) ali drugim imenovanim kontaktnim osebam zadevne hčerinske družbe (npr. v okviru osebnega razgovora) in, v primeru pomembnosti ZSZD, koordinatorju za človekove pravice ali imenovanemu uradniku za človekove pravice.

5. Zaščita deklaranta

a) Zaščita pred prikrajšanostjo ali sankcijami

Skupina Oetker zagotavlja ustrezno in učinkovito zaščito osebe, ki je posredovala informacije, pred kakršnim koli slabšim položajem ali sankcijami. To velja, če in kolikor je oseba, ki je zagotovila informacije, to storila v dobri veri, tj. če je oseba, ki je informacije zagotovila, utemeljeno domnevala, da so informacije v obvestilu resnične. Varstvo deklaranta se lahko zagotovi le, če se razširi pravni vpliv skupine Oetker.

Skupina Oetker ne dovoljuje nobene kulture obtožb, stigmatizacije ali predsodkov in bo podpirala in ščitila prizadete. V primeru zavestnega razkritja napačnih in/ali zavajajočih informacij (npr. zavestno lažnih sumov) si skupina Oetker pridržuje pravico do disciplinskih in/ali civilnih ali kazenskih ukrepov.

b) Ohranjanje zaupnosti in identitete

Skupina Oetker zagotavlja, da je identiteta prijavitelja in morebitnih tretjih oseb, omenjenih pri prijavitelju, zaščiteni ter da nepooblaščenim zaposlenim nimajo dostopa do nje. Prijavitelj ne sme biti v slabšem položaju zaradi uporabe postopka prijave nepravilnosti. Skupina Oetker ponuja možnost anonimnih prijav.

Informacije o identiteti se lahko razkrijejo pristojnim organom, če je to potrebno zaradi pravne obveznosti ali odredbe sodišča ali uradnika in če obstaja zadosten sum kaznivega dejanja.

6. Odgovornost in neodvisnost od strokovnih navodil, nepristranskost in strokovnost udeležencev postopka

Osebe, odgovorne za pritožbeni postopek, so imenovana organizacija za skladnost/pooblaščenca za skladnost poslovanja, v primeru pomembnosti SCDDA pa uradniki za človekove pravice in koordinatorji za človekove pravice. Skupina Oetker zagotavlja, da odgovorni za izvajanje postopka prijave nepravilnosti delujejo nepristransko, so neodvisni in niso vezani na strokovna navodila. Poleg tega skupina Oetker zagotavlja usposobljenost oseb, odgovornih za vodenje postopka prijave nepravilnosti.

7. Dodatne informacije, ki so možne pri opravljanju pregleda

Okoliščine je treba opisati čim bolj natančno. Več informacij, ki jih vsebuje opomba, učinkovitejša je obdelava. V pomoč so lahko na primer naslednje informacije:

- Kaj točno se je zgodilo?
- Kdaj in kdaj se je incident zgodil ali se nadaljuje?
- Kje se je zgodil incident (npr. v kateri državi, v katerem proizvodnem obratu, pri katerem dobavitelju)?
- Kdo so zadevni ljudje?
- Koliko ljudi je zaskrbljenih?
- Ste tudi vi zaskrbljeni?
- Kdo je še vedel za incident?
- Ali obstaja neposredna nevarnost za življenje in zdravje?
- Ali je bilo tveganje ali kršitev že prijavljena skupini Oetker?
- Če je odgovor pritrdilen, ali so bili sprejeti kakršni koli ukrepi za zmanjšanje ali odpravo tveganja ali kršitve?

8. Obdelava dohodnih obvestil

Skupina Oetker skrbno pregleda in obdelava vsa prejeta obvestila. Praviloma zdravljenje poteka v skladu z naslednjimi koraki:

a) Stopite v stik z osebo, ki je podala prijavo ali se obrnite nanjo

V potrebnem obsegu (npr. za razjasnitev okoliščin) in v možnem obsegu (odvisno od kanala za prijavo) lahko skupina Oetker stopi v stik z osebo, ki je podala prijavo, in komunicira z njo. V primeru anonimne prijave je stik ali komunikacija običajno mogoča le, če je bila prijava prejeta prek sistema obveščanja. V tem primeru se stik ali komunikacija vzpostavi prek sistema za prijavo, pri čemer se ohrani anonimnost.

b) Potrdilo o prejemu

Prijavitelj bo v sedmih dneh prejel potrdilo o prejemu prijave. Potrdilo se pošlje prek istega kanala za prijavo, prek katerega je bil razpis ukrepa prvotno prijavljen. Če potrditev prejema ni mogoča zaradi kanala za prijavo, ki ga izbere registracijski zavezanec (npr. anonimno pismo), skupina Oetker Group ni dolžna poslati potrdila o prejemu.

c) Examen de l'avis

Če skupina Oetker med preiskavo ugotovi, da je prijava upravičena, sprejme ustrezne preventivne in/ali korektivne ukrepe.

Če mnenje ni utemeljeno, skupina Oetker konča postopek. Priglasitev ni utemeljena, če na primer dejstva iz poročila o priglasitvi niso potrjena, če ni bila ugotovljena kršitev veljavne zakonodaje ali internih smernic skupine Oetker ali če priglasitev ni povezana s skupino Oetker ali njenimi poslovnimi partnerji.

d) Informacije o izidu postopka prijave nepravilnosti

Posameznik, na katerega se nanašajo osebni podatki, bo prejel obvestilo o statusu mnenja v treh mesecih po potrditvi njegovega prejema. Zadevna oseba bo obveščena tudi, kolikor je to mogoče, če je bil postopek prekinjen zaradi neutemeljenosti mnenja.

Vendar se lahko informacije zagotovijo le, če ne posegajo v pravno zaščitene interese, zlasti notranje preiskave ali pravice oseb, ki so predmet prijave ali ki so navedene v prijavi. Obveznost obveščanja ni potrebna v primerih, ko zaradi kanala za prijavo nepravilnosti, ki ga je izbrala, ni mogoče stopiti v stik z osebo, ki je podala prijavo.

9. Zunanje informacijske platforme

Prijavitelj ima tudi možnost, da organom, institucijam ali drugim odgovornim telesom Federacije, držav ali Evropske unije predloži zunanje uradno obvestilo. Upoštevajo se lahko naslednji elementi:

- osrednji urad za zunanje informacije zveznega urada za pravosodje
- sistem za prijavljanje nepravilnosti švicarskega finančnega nadzornega organa
- sistem prijavljanja nepravilnosti zveznega urada za varstvo konkurence

Dodatek 1

Skupino Oetker sestavljajo naslednji oddelki:

- Dr. August Oetker KG
- Sektor za prehrano - Dr. Oetker
- Divizija alimentaire - Conditorei Coppenrath & Wiese
- Sektor za pivo in brezalkoholne pijače - Radeberger Gruppe
- Poslovno področje: Drugi interesi - Flaschenpost SE
- Poslovna divizija Drugi interesi - Oetker Hotels
- Industrijski sektor Drugi interesi - Handelsgesellschaft Sparrenberg
- Interesi industrije Drugi interesi - MVBDA
- Industrija Drugi interesi - Roland Transport
- Poslovni oddelki Drugi interesi - Oetker Digital

Opomba: Ta priloga se posodablja vsako leto.