

# **Rules of Complaints Procedure of the Bahlsen Group in accordance with § 8 of the Act on Corporate Due Diligence in Supply Chains (LkSG)**

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**As of: 01.11.2025**

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# Preface

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The Bahlsen Group is aware of its social responsibility and is committed to respecting and strengthening human rights and protecting the environment. Since 01.01.2024, we are also obliged under the Act on Corporate Due Diligence in Supply Chains (LkSG) to fulfil human rights and environmental due diligence obligations in our own business area and our supply chain.

The complaints procedure required by Section 8 LkSG enables internal and external persons to report human rights and environmental risks or violations of human rights and environmental obligations. With these rules of procedure, we are creating transparency with regard to contact persons and reporting channels as well as the subsequent process. In this way, we not only want to make the complaints procedure as easy to use as possible, but also to promote the possibility of submitting reports.

## Purpose of the Complaints Procedure

The Bahlsen Group's complaints procedure gives potentially affected parties the opportunity to provide information on possible human rights and environmental risks or violations at Bahlsen Group companies (own business area) or in their supply chain (direct and indirect suppliers).

The complaints procedure serves as an

- early warning system to recognise / identify potential risks at an early stage and to be able to take preventive measures to counteract them, and
- instrument for remedial action in order to react as quickly as possible in the event of violations and to avert or minimise damage.

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## Area of Application

The Bahlsen Group's complaints procedure is available to a **wide range of people**: All internal (i.e. essentially employees of the Bahlsen Group) and external (including business partners, customers, employees of suppliers) persons in Germany and abroad can submit information or complaints (hereinafter referred to as "**whistleblowers**").

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Reports or complaints can be submitted for the human rights and environmental risks or violations covered by Section 2 (2) and (3) LkSG (hereinafter referred to as "**content**"). These are essentially

**Human rights risks or violations:**

- Child labour
- Forced labour
- Slavery
- Disregard for occupational safety and health obligations
- Disregard for the freedom of association
- Unequal treatment in employment
- Withholding an adequate living wage
- Destruction of the natural base of life through environmental pollution
- Unlawful violation of land rights
- Use of private or public security forces in violation of human rights
- Other behaviour that seriously impairs protected legal positions

**Environment-related risks or violations:**

- Failure to comply with environmental protection prohibitions (Minamata Convention, Stockholm Convention, POPs Convention, Basel Convention)

The reports or complaints may relate to the Bahlsen Group and its subsidiaries (own business area) as well as to its supply chain (direct and indirect suppliers) (hereinafter referred to as "localisation").

## Reporting Channels and Contact Persons

To ensure that the Bahlsen Group's complaints procedure is easily accessible to all those affected, there are various options for submitting reports or complaints:

**a) Online whistleblowing system:**

The main channel for reports and complaints is an online whistleblowing system. This is free for whistleblowers to use and can be accessed online via the following link: [Online whistleblowing system](#)

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## **b) Contact by telephone and/or in writing:**

Complaints can also be made by telephone, e-mail or post:

Bahlsen GmbH & Co. KG  
Legal & Compliance / LkSG-Complaints Office  
Podbielskistr. 11  
30163 Hanover, Germany

E-Mail: [compliance@bahlsen.com](mailto:compliance@bahlsen.com)  
Tel.: +49 511 960 2637

## **c) External Confidants (Lawyers):**

It is also possible to submit information or reports to external confidants (lawyers). These are then forwarded anonymously to Bahlsen GmbH & Co KG, if desired. These are:

Dr. Claudia Voggenreiter  
E-Mail: [voggenreiter@zenk.com](mailto:voggenreiter@zenk.com)  
Tel.: +49 30 247574-14

Jan Dietze  
E-Mail: [dietze@zenk.com](mailto:dietze@zenk.com)  
Tel.: +49 40 226 64 162

# **Course of the Complaints Procedure**

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Regardless of how information or complaints about human rights or environmental risks or possible violations are reported, the LkSG-Complaints Office always follows a standardised procedure to ensure that they are processed promptly and appropriately. This is described in more detail below:

### **1. Confirmation of receipt:**

Once a report or complaint has been received, the person making the report will receive confirmation within approximately one week.

### **2. Review of the report or complaint:**

The next step is to check whether the report or complaint falls within the scope of the LkSG complaints procedure, i.e. whether it addresses human rights or environmental risks or violations.

The next step is to check whether there is a concrete initial suspicion and whether sufficient information is available to clarify the facts.

For this purpose, it may be necessary to contact the whistleblower and request further information. If the complaints procedure is discontinued, e.g. because the report or complaint does not fall within the scope of application and/or the initial suspicion is not substantiated, the whistleblower will be informed accordingly. No other persons will be informed of the facts described in the report.

### **3. Investigation of the case:**

Once the investigation has been completed, an internal investigation is initiated by the LkSG-Complaints Office. The persons entrusted with processing the reports can act independently and impartially and are not bound by instructions. They are also obliged to maintain confidentiality. Under certain circumstances, it may also be necessary to involve third parties in the investigation.

If the initial suspicion is substantiated, appropriate remedial measures will be developed to minimise or eliminate the corresponding risks or violations.

The duration of the procedure may vary depending on the scope and complexity of the complaint. However, the complaints office maintains regular contact with the whistleblower during this time.

### **4. Conclusion of the case:**

The aim is to conclude the procedure within a period of approx. 3 months, i.e. by then remedial measures will have been developed, implemented and their implementation monitored. The procedure is concluded when the whistleblower is notified of the results of the investigation and the corrective measures taken.

## **Confidentiality and Protection from Reprisals**

Confidentiality, i.e. the protection of the anonymity or identity of the whistleblower, and protection against reprisals are of the utmost importance to the Bahlsen Group and a prerequisite for an accepted and effective complaints procedure.

We therefore rely on a variety of technical and organisational measures to ensure both:

**a) Confidentiality:**

The whistleblower system is administered online via a standardised system equipped with a high level of data and access security. The system is technically designed in such a way that there is no way for the Bahlsen Group, its employees or the LkSG-Complaints Office to identify the whistleblower. Processing takes place via external servers of a third-party provider, which are operated in Germany and correspond to the highest security class. The LkSG-Complaints Office and, once reports have been approved, the internal investigators are technically able to communicate with the whistleblowers via the system while maintaining anonymity. In this way, any further necessary queries and narrowing-down questions can be asked. Whistleblowers also have the option of deliberately choosing not to remain anonymous.

Information such as personal data and other information that allows conclusions to be drawn about the identity of the person making the report is also treated confidentially for the other reporting channels. The persons entrusted with the complaints procedure have been trained accordingly. Personal data is also stored or retained for a maximum period of seven years.

**b) Protection from reprisals:**

No pressure is exerted on a whistleblower who submits an LkSG-relevant report or complaint in good faith, nor are they threatened with personal or legal disadvantages. This is also set out in the internal company-wide agreement on the whistleblower system.

## **Effectiveness of the Complaints Procedure**

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This procedure is reviewed for effectiveness at least once a year or as required. If necessary, adjustments are made to the procedure or remedial actions are taken.