

# Procedure for the Hochland Group's grievance mechanism for its own business area and the supply chain

### Introduction:

• Responsibility for the complaints procedure

The Corporate Compliance department of Hochland SE is responsible for setting up and providing this complaints procedure. For detailed questions about the processes of the complaints procedure under the Supply Chain Act, please contact the Corporate Compliance department and the Human Rights Office of the Hochland Group.

Complaints within the meaning of this procedure

Complaints within the meaning of these Procedure are information on human rights and/or environmental regulations in the business area of Hochland SE and its group companies as well as along the supply chain.

• Who can submit complaints and who is responsible for processing the information?

The Procedure addresses employees of the Hochland Group, employees of direct and indirect suppliers of the Hochland Group and other third parties who wish to draw attention to potential risks ("early warning system") and grievances with regard to human rights and environmental issues ("access to appropriate remedial action") in connection with the business activities of the Hochland Group. Hochland has defined persons to handle complaints for this purpose and conducts internal training courses.

• Can whistleblowers suffer reprisals?

Whistleblowers enjoy special protection, and the Hochland Group's complaints procedure has been designed accordingly. Whistleblowers who submit complaints in good faith do not have to be afraid of any repressive measures such as discrimination or other consequences. This applies regardless of whether the complaint proves to be true or false. Complaints received are only processed by a small group of selected and trained persons who are obliged to maintain confidentiality. All personal data and information that allow conclusions to be drawn about individuals or groups of individuals are treated confidentially during and after the conclusion of the procedure and are generally not passed on. Exceptions to the confidentiality requirement arise from corresponding legal obligations or if the person providing the information expressly requests and permits the disclosure of its identity. The deletion of information received and internal documentation is carried out in accordance with the statutory provisions.

## Procedure of the complaints process

• Receipt of the notification

Upon receipt of the notification by Hochland, the responsible persons are informed. This can be done systemically or by receiving a letter by post. The person submitting the report can set up an anonymous mailbox in the system in order to remain in contact with the persons processing the report. If the complaint has been submitted via the TELL US! system or if communication with the person submitting the complaint is possible by other means, she/he will receive confirmation of receipt of the complaint and any questions to explain the facts within 7 days at the latest.



Admissibility & plausibility check (initial assessment)

After receipt and confirmation of receipt, the complaint is checked by the administrators of the Compliance department for admissibility in accordance with the Supply Chain Act and for plausibility.

Processing of the complaint - forwarding to other departments if not relevant

If the complaint is plausible and relates to legal positions protected by the Supply Chain Act, the information gets forwarded to the persons responsible for processing the information. They investigate the complaint in order to obtain further information. This also means that, if necessary, queries are made to the whistleblower about the subject of the complaint via the anonymous mailbox that has been set up or, if possible, in a direct exchange.

Remedial measures

If the assessment reveals that there is a high risk of a violation of human rights/environmental protection rights or that a violation is imminent or has already occurred, remedial measures are initiated. The whistleblowers then monitor the remedial measures and check their effectiveness with the Human Rights Office. If no remedial measures are necessary, the further course of action gets discussed, and proposals are drawn up.

• Response to the whistleblower - case closure

After the facts of the case have been clarified, the whistleblower receives a response to her/his complaint and to any remedial action taken or possible remedial action. This usually takes place no later than 3 months after receipt of the report. Once the necessary measures have been implemented and a final response has been sent to the whistleblower, the complaint is closed and stored for seven (7) years in accordance with the legal obligation.

## Contact addresses Hochland

- Human Rights Office
  - o E-mail address: <a href="mailto:humanrights@hochland.com">humanrights@hochland.com</a>
  - By post to the Human Rights Office:
    - Human Rights Office, Kemptener Str. 17, D-88178 Heimenkirch

#### Data protection

• Link to TELL US! Data protection: <u>Home - BKMS System (bkms-system.com)</u>