



Rules of Procedure for the Companies of EDEKA Group for the Complaints Procedure in Accordance with the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

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1. Objectives and scope of application of the complaints procedure

The complaints procedure of the companies of EDEKA Group enables all potential parties involved to report human rights-related or environment-related risks and violations of obligations that have arisen as a result of the economic actions of a company of EDEKA Group in its own business area or of a supplier.

The complaints procedure and the associated establishment of a reporting office for the receipt of reports of risks or violations serve as an “early warning system” within the supply chain. It is accessible to all potential parties involved, i.e. both employees of the companies in EDEKA Group and all other parties throughout the full length of the supply chain.

The complaints procedure is an instrument that provides the companies of EDEKA Group with the means to ward off impending legal violations at an early stage by initiating preventive measures or to take remedial action whenever violations have already occurred.

Information or complaints concerning **any and all human rights-related and environment-related risks or violations of obligations** that are covered by section 2(2) and (3) LkSG can be submitted by following the complaints procedure of the companies of EDEKA Group.

Human rights-related prohibitions include:

- Child labour (as a rule, prohibition of employment of children under 15 years of age)

- Forced labour
- Slavery, sexual exploitation
- Failure to comply with health and safety regulations under the law of the place of employment
- Withholding adequate wages
- Use of private or public security forces if they are poorly controlled, thereby violating *inter alia* the prohibition of torture or degrading treatment
- Contamination of soil, water and air and excessive water consumption
- Unlawful eviction or deprivation of land, forests or bodies of water
- Any action or omission that is likely to impair a protected legal position in a particularly serious manner and whose illegality is obvious (general clause)

Environment-related prohibitions include:

- Prohibition of the production of compounds containing mercury
- Prohibition of the use of mercury in manufacturing processes
- Prohibition of improper treatment of mercury waste
- Prohibition of the production and use of certain chemicals and persistent organic pollutants
- Prohibition of the handling, collection, storage and disposal of waste using methods incompatible with environmental protection
- Various prohibitions on the export and import of certain hazardous wastes

2. Central reporting office for the companies of EDEKA Group

EDEKA Verband kaufmännischer Genossenschaften e. V., Hamburg (“**EDEKA Verband**”), has established a central reporting office for the companies of EDEKA Group where information and complaints relating to human rights or environmental risks or violations of obligations can be submitted by name or anonymously. The reporting office is staffed by (in-house) lawyers who work independently and are not bound by instructions.

The EDEKA Verband has engaged the independent compliance service provider *eagle lsp Law Rechtsanwalts-gesellschaft mbH* (“**eagle lsp**”) to set up a central reporting system. The capture of incoming submissions in the reporting system and the initial review are carried out by the EDEKA Verband in cooperation with eagle lsp.

Further processing of the information and complaints is carried out by the competent departments at the pertinent companies of EDEKA Group.

3. Sequence of the complaints procedure

Any persons wishing to submit information or a complaint regarding human rights-related or environment-related risks or violations of obligations (if, for example, they have themselves been affected by an incident or have become aware of the occurrence of a violation) may submit their information or complaint via the reporting platform of the companies in EDEKA Group.

3.1 Entering complaints via the reporting platform

Links to the reporting platform for the complaints procedure can be found e.g. in the lower section of the home pages (link “Human Rights & Whistleblowing”) on the website of EDEKA Group <https://verbund.edeka> and on the customer website www.edeka.de.

The reporting platform is available in German and English.

Submission of the information or complaint on the reporting platform as a text or voice message requires only a few “clicks”.

Anonymity is an option throughout the entire course of the complaints procedure, and the confidentiality of the communication is assured at all times.

Once a report has been submitted, persons submitting the report receive an automatically generated report ID and the option to enter their individual password.

Alternatively, an email address can also be entered. In this case, the reporting parties receive email notifications whenever any changes in the status or any feedback relating to their submitted report occurs. At this time, the email address that was provided is not used for direct communication and is not forwarded to the competent persons at the reporting office.

Using the report ID and password, reporting parties can view the processing status of their submissions at any time under the heading "*Track my report*" and communicate with the competent persons at the reporting office.

The reporting platform can be accessed 24/7; reports can be submitted at any time.

There is no charge for the use of the platform to anyone submitting a report.

3.2 Review of the complaint

The information or complaint is sent to the central reporting office of the companies of EDEKA Group and is captured in the reporting system.

The reporting persons receive an acknowledgement of receipt in their (anonymous) inbox within the statutory time limits. If necessary, the central reporting office clarifies any initial queries about the reported circumstances with the reporting parties.

Subsequently, the complaint is forwarded to the competent departments of the involved companies of EDEKA Group for further processing. The information (especially the data or identity of the reporting persons, if known) will be transferred solely insofar as necessary to process the incident. The confidentiality of the data is assured at all times.

The office in charge of the processing at the involved company determines what further steps are required. If necessary, further queries about the facts of the case will be clarified with the reporting persons via the (anonymous) inbox.

As soon as the facts have been clarified, the involved company takes appropriate measures to remedy any violations. The duration of the measures may vary depending on the specific case. The contact option for reporting persons that is always available ensures that information on the status of the proceedings can be obtained at any time.

The office of the involved EDEKA Group company in charge of processing complaints decides on the conclusion of any complaint procedure. It is supported by the (in-house) lawyers of the reporting office at the EDEKA Verband if there are any legal issues.

3.2 Response to reporting persons

The procedure includes opportunities to contact reporting persons at any time. When the complaint procedure has been concluded, the reporting persons receive a final notification in their (anonymous) inbox, describing any initiated measures (insofar as relevant). This concludes the processing.

This procedure is followed for every complaint case, regardless of the relevance of the information or complaint. It ensures that reporting persons can be certain that their reports have been received and reviewed.

4. Contacts for the complaints procedure

Contacts for the complaints procedure of the companies of EDEKA Group in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains are shown here:

EDEKA Verband kaufmännischer Genossenschaften e.V.

LkSG Reporting Office

New-York-Ring 6

22297 Hamburg

Email: supplier-compliance@edeka.de

Eagle Isp Law Rechtsanwalts-gesellschaft mbH

Neustädter Neuer Weg 22

20459 Hamburg

Email: ms-support@eagle-isp.de

5. Protection of the confidentiality of identity

Anonymity is an option throughout the entire course of the complaints procedure, and the confidentiality of the communication is assured at all times. The protection of the reporting persons has the highest priority, which means that the information and the complaint can be read solely by the reporting persons and the associated backend. The platform operator cannot read any content nor are IP addresses recorded. The following procedures have been implemented to provide technical protection of the reporting persons:

- End-to-end encryption between browser reporting platform and case management (WebCrypto) and
- Transport encryption. All data stored on the reporting platform and in case management databases are encrypted.
- Regular IT security audits monitor system security.
- Rule-based erasure routines support the erasure of received messages in conformity with privacy regulations. The possible use of two-factor authentication when accessing case management offers additional protection from unauthorised access to personal data via the backend. The SaaS offering of the whistleblower system is provided exclusively on servers in data centres that are subject to German legal regulations and located in Germany; they are certified in accordance with ISO 27001 and 9001. End-to-end encryption ensures that the operators of the data centres are unable to read the submitted messages.

6. Ensuring protection from discrimination or punishment

Persons submitting a report in the complaints procedure of the companies of EDEKA Group do not face any negative consequences. Maximum protection is assured by the provision of the option of anonymous communication during the entire complaints procedure. The confidentiality of the communication is ensured at all times (see **section 5**) and is guaranteed internally by appropriate measures.