



# Procedural Rules for the Companies of the EDEKA Cooperative for the Complaints Procedure Pursuant to the German Supply Chain Due Diligence Act ("LkSG")

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## 1. Objectives and Scope of the Complaints Procedure

The complaints procedure of the companies of the EDEKA-Verbund ("EDEKA Cooperative") enables all potentially affected persons to point out risks and breaches of duty relating to human rights or the environment, which have been caused by the economic actions of a company of the EDEKA Cooperative within its own business sphere or the business sphere of a supplier.

The complaints procedure and the related installation of a whistleblower office for reports about risks or violations serves as an "early warning system" within the supply chain. It is accessible to all who are potentially affected, i.e., to both the employees<sup>1</sup> of the companies of the EDEKA Cooperative as well as all other individuals within the entire supply chain.

The complaints procedure allows the companies of the EDEKA Cooperative to counteract impending legal violations at an early point already by taking preventive actions or by remedying the previously occurred violations.

The complaints procedure for the companies of the EDEKA Cooperative can be used for reports or complaints regarding **all risks or breaches of duty relating to human rights or the environment** that are covered by Sec. 2 (2) and (3) LkSG.

Prohibitions relating to human rights include:

- Child labor (general prohibition of the employment of children below the age of 15 years)
- Forced labor

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<sup>1</sup>In the interest of better readability, we omit the use of multiple gender-specific references in these procedural rules to persons identifying as male, female and transgender. All references to persons always apply equally to all genders.

- Slavery, sexual exploitation
- Violation of occupational health and safety regulations according to the law applicable at the place of employment
- Deprivation of appropriate wages
- Use of private or public security services if these are insufficiently regulated, therefore, also prohibiting, among other, torture or demeaning treatment
- Contamination of the soil, waters, air and excessive water consumption
- Illegal forced evictions or deprivation of land, forests or waters
- Any actions or omitted actions that can impair a protected legal position in a particularly serious manner and the illegality of which is obvious (general clause).

Prohibitions relating to the environment include:

- Prohibition of the production of compounds containing quicksilver
- Prohibition of the use of quicksilver in manufacturing processes
- Prohibition of improper treatment of quicksilver wastes
- Prohibition of the production and use of certain chemicals and persistent organic pollutants
- Prohibition of handling, collecting, storing and disposing of wastes in ways not compatible with the environment
- Various prohibitions of the export and import of certain hazardous wastes.

## 2. Central Whistleblower Office for the Companies of the EDEKA Cooperative

EDEKA ZENTRALE Stiftung & Co. KG {"b>EDEKA Head Office") has installed a central whistleblower office for the companies of the EDEKA Cooperative where reports and complaints – including anonymous reports and complaints – can be made of risks or breaches of duty relating to human rights or the environment.

The EDEKA Head Office has contracted the independent compliance service provider, the law firm Isp Rechtsanwalts-gesellschaft mbH ("**eagle Isp**"), for organizing the central whistleblower system.

In addition, the EDEKA Head Office has set up the LkSG Complaints Service for the processing of the complaints. The employees of the LkSG Complaints Service are bound by instructions and subject to non-disclosure duties in the performance of their work.

The received complaints are entered into the whistleblower system and undergo a first check by the LkSG Complaints Service in cooperation with the lawyers of eagle Isp.

The LkSG Complaints Service then sees to the further processing of the complaints in cooperation with the offices responsible for this at the companies of the EDEKA Cooperative that are affected by the report.

## 3. Complaints Procedure Process

If someone wants to make a report or a complaint regarding breaches of duty relating to human rights or the environment, for example, because they themselves are affected by the incident or have received knowledge of it, they can make their report or complaint using the reporting platform for the companies of the EDEKA Cooperative.

### 3.1 Entering Complaints via the Reporting Platform

Links to the reporting platform for the complaints procedure can be found, for example, on the website of the EDEKA Cooperative <https://verbund.edeka> and on the customer website [www.edeka.de](http://www.edeka.de) in the footer on each page (link "LkSG Beschwerde" [LkSG Complaint]).

The reporting platform is available in German, English and Spanish.

The reporting person can enter a report in text form or as voice message with just a few clicks on the reporting platform.

During the entire complainant process, it is possible to communicate anonymously. The confidentiality of the communication is assured at all times:

After the report was filed, the whistleblower will get an automatically generated report ID and be able to choose their own personal password.

Alternatively, an e-mail address can be specified in addition. In that case, the whistleblower will get e-mail notifications as soon as there are status changes or responses to their submitted report. In the process, the saved e-mail address will not be used for direct communication and not be passed on to the person in charge at the whistleblower office.

By means of the report ID and the password, the whistleblower can view the processing status of their report at any time under "*Track my report*" and communicate with the person in charge at the whistleblower office.

The reporting platform is accessible around the clock so that reports can be filed at any time.

The whistleblower will not incur any costs for the use.

### 3.2 Investigation of the Complaint

The complaint is received by the LkSG Complaints Service and entered in the whistleblowing system.

The whistleblower will receive a confirmation of receipt via the (if applicable, anonymous) mailbox during the statutory periods. If necessary, the central whistleblowing office will also resolve questions about the facts with the whistleblower.

Then, the complaint will be forwarded for further processing to the competent offices of the relevant companies of the EDEKA Cooperative that are affected by the complaint. **The information (especially the data or identity of the whistleblower if known) will be transferred in the process only to the extent that is necessary for the processing of the case. The confidential treatment of the data is assured at all times.**

The office responsible for the processing at the affected company will determine the further steps. If needed, additional questions about the facts will be resolved with the whistleblower by the LkSG Complaints Service via the (if applicable, anonymous) mailbox.

As soon as the facts are clear, the affected company will determine suitable measures to remedy potential violations. The period of time required for the measures can vary depending on the specific case. It is ensured for the whistleblower by the permanent possibility to get in touch with the LkSG Complaints Service that information on the status of the procedure can be obtained at any time.

The LkSG Complaints Service will decide on the closing of each complaints procedure. For legal questions, it receives support from the (in-house) lawyers of EDEKA Verband kaufmännischer Genossenschaften e.V.

### 3.2 Response to the Whistleblower

During the entire procedure, there is the possibility to contact the whistleblower. After the complaints procedure is closed, the whistleblower will receive a final notification from the LkSG Complaints Service sent to their (if applicable, anonymous) mailbox with a statement of the measures taken as the case may be. This is the end of the processing.

This is done for each complaint case, regardless of the relevance of the report or the complaint. This way, the whistleblower can be sure that their report has been noticed and reviewed.

## 4. Contacts for the Complaints Procedure

The contacts for the complaints procedure for the companies of the EDEKA Cooperative pursuant to the German Supply Chain Due Diligence Act are:

**EDEKA ZENTRALE Stiftung & Co. KG**  
LkSG-Beschwerdeservice [LkSG Complaints Service]  
New-York-Ring 6  
22297 Hamburg  
E-mail: [lksgbeschwerdemanagement@edeka.de](mailto:lksgbeschwerdemanagement@edeka.de)

**Eagle Isp Law Rechtsanwaltsgesellschaft mbH**  
Neustädter Neuer Weg 22  
20459 Hamburg  
E-mail: [ms-support@eagle-isp.de](mailto:ms-support@eagle-isp.de)

## 5. Non-disclosure of Identity

During the entire complainant process, it is possible to communicate anonymously. The confidentiality of the communication is assured at all times. The top priority is given here to whistleblower protection, which means the report or the complaint can only be read by the whistleblower and the attributed back end. The platform operator cannot read any contents. No IP addresses are logged either. The following procedures have been introduced as technical protection of the whistleblower:

- end-to-end encryption between the browser with which the reporting platform is accessed and the case management (WebCrypto), and
- transfer encryption. All data that is filed in the databases of the reporting platform and case management is encrypted.
- Regular IT security audits verify the system's security.
- Rules-based deletion routines support the deletion of all received reports in compliance with data protection regulations. A possible two-factor authentication for access to the case management offers additional protection from unauthorized access to personal data via the back end. The SaaS offer of the whistleblower system is provided exclusively on servers in computing centers that are subject to the German jurisdiction, located in Germany and certified according to ISO 27001 and 9001. The end-to-end encryption prevents that the operators of the computing centers can read filed reports.

## 6. Assurance of Protection from Discrimination or Retributions

The whistleblower is not threatened by negative consequences when filing a report in the complaints procedure for the companies of the EDEKA Cooperative. To assure them a maximum of protection, there is the possibility of communicating anonymously during the entire complaints procedure. Confidentiality of the communication is assured at all times (see **Section 5**) and it is secured by suitable measures.