

## The Whistleblowing System of the Südzucker Group – FAQs

### 1 Who can give a report?

The Whistleblowing System of the Südzucker Group is available to employees, temporary workers, business partners (customers, suppliers, service providers) or other third parties who wish to report irregularities caused by Südzucker's business activities or along the supply chain in Germany and abroad.

### 2 On which topics can reports be submitted?

The Whistleblowing System of the Südzucker Group enables the aforementioned group of people to report (potential) violations of applicable law, internal guidelines and Südzucker Group's code of conduct.

Information can be provided in particular on the following points:

- Anti-competitive behaviour
- Corruption and bribery
- Discrimination and harassment / bullying
- Insider trading
- Violations of data protection laws
- Risks and violation of environmental protection laws
- Risks and violation of occupational health and safety regulations
- Risks and violations of human rights
- Fraud / embezzlement / theft
- Violations of the Code of Conduct of the Südzucker Group

### 3 What should I do if I have observed misbehaviour?

Ideally, possible misconduct should be discussed in direct dialogue so that a possible violation can be investigated and remedied as quickly and appropriately as possible. Whistleblowers can always address their concerns directly to their supervisor or contact person in the company (managing director, plant manager), the local works council or the local Compliance Officers of the Südzucker divisions/subsidiaries or the Chief Compliance Officer of Südzucker AG.

### 4 Which reporting channels can be used to submit a report?

A report can generally be made in a personal meeting, by phone, by e-mail, by letter or electronically via a Compliance Line to the locally responsible Compliance Officer of the Südzucker divisions/subsidiaries.

Available electronic reporting channels (Compliance Lines) within the Südzucker Group are operated by an external provider, the EQS Group, in the EQS Integrity Line.

These and other electronic reporting channels can be accessed on the Südzucker Group [website](#) or [intranet](#).

You can reach the Chief Compliance Officer of Südzucker AG via the following reporting channels:

- Compliance Line of Südzucker Group: <https://suedzuckergroup.integrityline.app>
- Please send an e-mail to: [compliance@suedzucker.de](mailto:compliance@suedzucker.de)
- Notice by letter to: Südzucker AG, Compliance Officer, Maximilianstr. 10, 68165 Mannheim, Germany
- Note about the compliance phone number (German): +49 621 421 639

## 5 Can reports also be submitted anonymously?

Reports can also be submitted anonymously.

We expressly point out that all persons involved in the clarification of the facts are sensitised not to ask for your identity at any time or to draw any conclusions about it.

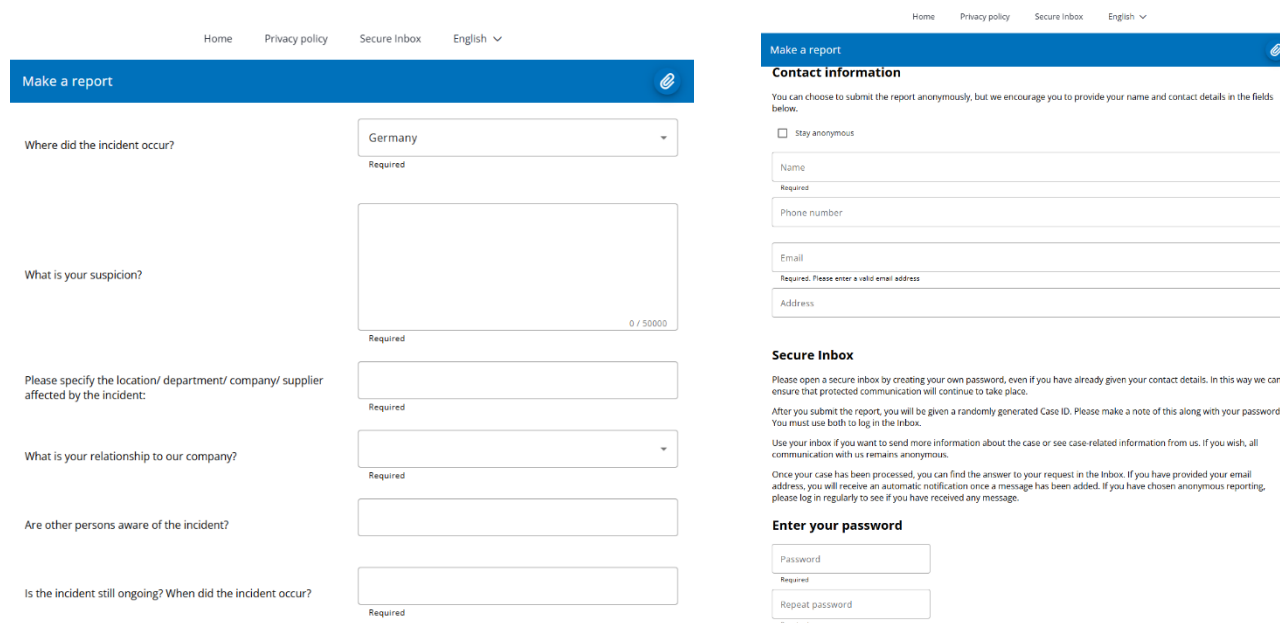
Information about the identity may be passed on to the competent authorities if this is necessary due to a legal obligation or a court or official order or if there is reasonable suspicion of a criminal offence.

## 6 What information should a report contain?

To ensure that the report is processed quickly and appropriately, it is important that the report contains all relevant information and is described as precisely as possible. The following information, for example, which we also request in our standard form in the Compliance Lines, can be helpful here:

- **Where did the incident occur?** (in which country, at which production site, at which company, at which supplier did the problem occur)
- **What do you suspect / What has actually happened?** (Type of problem, rules or laws involved, is there an immediate danger to life or limb?)
- **What is your relationship with the company?**
- **Who was involved and who is affected?** / Are other people aware of the incident?
- **When did the incident first occur?** / Is the incident still ongoing?

### Standard form of the Compliance Lines:



The screenshot displays the reporting interface. The top navigation bar includes 'Home', 'Privacy policy', 'Secure Inbox', and 'English'. The main form is titled 'Make a report' and contains several sections:

- Where did the incident occur?**: A dropdown menu with 'Germany' selected. Below it is a large text area for 'What is your suspicion?' with a character count of 0 / 50000.
- Please specify the location/ department/ company/ supplier affected by the incident:**: A text input field.
- What is your relationship to our company?**: A dropdown menu.
- Are other persons aware of the incident?**: A text input field.
- Is the incident still ongoing? When did the incident occur?**: A text input field.

The right-hand side of the form is titled 'Contact information' and includes:

- An option to 'Stay anonymous' (unchecked).
- Input fields for 'Name', 'Phone number', 'Email', and 'Address'.
- A section for 'Secure Inbox' explaining the process of creating a password and receiving notifications.
- An 'Enter your password' section with fields for 'Password' and 'Repeat password'.

## **7 Who is responsible for processing the information received?**

The Compliance Officers of the Südzucker divisions/subsidiaries are responsible for processing the reports within their area of responsibility and can, if necessary, carry out the processing in coordination with specialised departments.

The persons entrusted with the implementation of the Whistleblowing System act impartially, are not bound by professional instructions, are independent and are obliged to maintain confidentiality. Südzucker also ensures that the persons entrusted with the implementation of the whistleblower procedure are competent, i.e. appropriately trained.

## **8 How are whistleblowers protected?**

Whistleblowers do not suffer any disadvantages.

This applies insofar as the whistleblower does not intentionally or grossly negligently provide false or untruthful information. We expressly point out that our Whistleblowing System may not be misused to defame others or make false claims.

Südzucker reserves the right to consider disciplinary and/or civil or criminal law measures in the event of demonstrably wilful or grossly negligent disclosure of false information (e.g. wilfully false suspicions, false allegations).

## **9 What happens after a report has been submitted?**

All comments received are carefully checked and processed. As a rule, processing takes place in the following steps:

- The whistleblower will receive a confirmation of receipt immediately after submitting the report, but no later than seven days after submitting the report. This applies if we have the relevant contact details or the whistleblower has submitted a report via the Compliance Line.
- After an initial check, the facts of the case may be clarified. This may require contacting the whistleblower and/or the specialised departments.
- If it is determined during the discussion of the facts that the information is justified, Südzucker will take appropriate follow-up measures.
- If the complaint is unfounded, Südzucker will discontinue the proceedings.
- The whistleblower will be informed of the result of the investigation and, if applicable, of any follow-up measures taken within three months of the confirmation of receipt at the latest.
- Where possible, the whistleblower will also be informed if the proceedings have been discontinued because the report is unfounded.
- Information shall only be provided if this does not affect internal enquiries or investigations or the rights of the persons who are the subject of the information.

## **10 How long is the information stored?**

The retention of documentation and stored data is governed by legal requirements.