

<b>Verfahrens- anweisung</b>		<b>Rules of Procedure on complaints procedure to Section 8 Supply Chain Due Diligence</b>		
<b>Revision</b>	<b>Bereich</b>	<b>Geltungsbereich</b>		
00	18 Unternehmens- leitung / Politiken	ARYZTA Bakeries Deutschland GmbH Hiestand Beteiligungsholding AG (CH) & Co. KG		

## 1. Introduction

The ARYZTA Group assumes responsibility for respecting and strengthening internationally recognized human rights within its own business areas and through appropriate management of its supply chains. ARYZTA Bakeries Deutschland GmbH and its sole shareholder, Hiestand Beteiligungsholding AG (CH) & Co KG (ARYZTA), implement all requirements of the German Supply Chain Due Diligence Act (LkSG) for the fulfillment of human rights and environmental due diligence obligations and comply with their implementation. An essential core element of these due diligence obligations is the establishment of an effective complaints procedure through which information on human rights and environmental risks or violations can be submitted.

These rules of procedure provide information on the main features of the complaints procedure, access to the procedure and its availability as well as the responsibilities. Furthermore, it also provides information on what happens with incoming information, i.e. how the complaints procedure is carried out. It is important to ARYZTA to present this information in an understandable and comprehensible manner and to create the greatest possible transparency about the process.

## 2. Purpose of the complaints procedure

The complaints procedure is intended to give any person or group of persons the opportunity to submit relevant information to the ARZYTA Group and thus draw attention to human rights risks (early warning system).

However, persons or groups of persons are also given the opportunity to report suspected infringements so that damage can be averted or minimized immediately (access to appropriate remedies).

## 3. Anyone who can provide information

Anyone can submit information, regardless of whether they are in Switzerland or abroad.

What types of notices can be submitted?

The complaints procedure enables individuals to report human rights and environmental risks and violations of human rights or environmental obligations that have arisen as a result of the ARYZTA Group's business activities in its own business area or in the supply chain.

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#### 4. How tips can be submitted

Reports can be submitted in two different ways at any time. All reports, regardless of how they are received by the ARYZTA Group, are processed immediately and in the same way.

- The ARYZTA Group provides an electronic information system in which information can be entered into a web form. It can be used in 20 languages.

The hint system can be accessed here: <https://aryzta.navexone.eu>

- Information should be sent by post to:

ARYZTA Bakeries Deutschland GmbH  
Human Rights Office (LkSG)  
Theodor-Heuss-Platz 7  
14052 Berlin

Both channels ensure that reports are handled confidentially. The whistleblowing system enables a mailbox to be set up through which the whistleblower can communicate with the ARYZTA Group while keeping their identity confidential.

#### 5. Who processes the notes

Notes are processed by the ARYZTA Group by selected and specially trained employees. All employees who are responsible for processing have the following characteristics. They are impartial, independent, not bound by professional instructions, sworn to secrecy, appropriately trained and provided with sufficient time resources.

#### 6. How the complaints procedure works

Once a tip-off has been received, the person making the tip-off will receive confirmation within one week.

The ARYZTA Group will remain in contact with the whistleblower throughout the entire procedure, provided this is desired and a contact option is established.

The reports are first reviewed centrally by the ARYZTA Group Human Rights Office to determine whether the reported issue constitutes a human rights or environmental risk or a violation of human rights or environmental obligations. It is also checked which ARYZTA company or supplier is affected by the report. The report is then passed on to the responsible office within the ARYZTA Group.

The next step is to clarify the facts of the case, which generally takes place within three months.

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The persons responsible for the complaints procedure at the ARYZTA Group or the respective location are entrusted with clarifying the facts of the case.

If, in the course of clarifying the facts, it is determined that a violation of human rights and/or environmental obligations is imminent or is already taking place, the ARYZTA Group will immediately initiate remedial measures.

In addition, a proposal for further action will be drawn up based on the findings of the clarification of the facts.

## **7. How whistleblowers are protected from discrimination and reprisals**

The protection of whistleblowers against discrimination or punishment on the basis of information provided is an important part of our complaints procedure.

The following measures serve to protect whistleblowers:

- All information is only processed by a small group of selected and specially trained employees.
- All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, will be treated confidentially. This also applies after the procedure has been completed.
- In accordance with legal requirements, internal company documentation is stored for seven years and then destroyed.

The ARYZTA Group and its companies protect whistleblowers from being disadvantaged or penalized because of a tip-off.

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