

Information on Südzucker Group's whistleblower system

1 Who can give a hint

The whistleblower procedure is open to anyone who wishes to point out potential misconduct or violations of the law that have arisen as a result of Südzucker Group's business activities. Whistleblowers can be, for example, employees, contractors, suppliers, customers, residents, investors or uninvolved persons.

2 On which topics can a hint be given ?

The whistleblower procedure enables the aforementioned group of persons to point out actual or potential violations of applicable law and of Südzucker Group's internal guidelines and business principles).

In particular, advice can be given on the following focal points:

- Anti-competitive behaviour
- Corruption and bribery
- Discrimination and harassment / bullying
- Insider trading
- Breaches of data protection regulations
- Risks and violations of environmental protection regulations
- Risks and violations of occupational health and safety regulations
- Risks and violations of human rights
- Fraud / Embezzlement / Theft
- Violations of the Südzucker Group code of conduct

3 Is the submission of a notice free of charge?

The whistleblowing procedure is free of charge for the whistleblower.

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

The channels described below are open to anyone who wishes to point out grievances:

- Südzucker Group's reporting channel: "Südzucker Compliance Line". The "Südzucker Compliance Line" is operated by an external provider, Business Keeper AG, in the so-called BKMS® system (<https://www.bkms-system.com/suedzucker>).
- Note by e-mail to: compliance@suedzucker.de
- Notification by letter to: Südzucker AG, Compliance Officer, Maximilianstr. 10, 68165 Mannheim, Germany
- Note by the compliance telephone no. (German): +49 621 421 639
- Verbal or written notification to the managing director/plant manager of each Südzucker Group location.

The "Südzucker Compliance Line" reporting channel is available in the following languages:

- German
- English
- French
- Dutch
- Polish
- Romanian
- Spanish

However, the messages themselves can also be submitted here in any other language.

5 Can reports also be submitted anonymously?

Information can also be provided anonymously. In any case, Südzucker Group always guarantees strict confidentiality about the identity of the whistleblower.

6 What information should a report contain?

In order to ensure a quick and appropriate processing of the report, it is important that it contains all relevant information and circumstances are described as precisely as possible. For example, the following information may be helpful:

- **What** specifically has happened? (Type of problem, rules or laws involved, is there immediate danger to life or limb?)
- **When** or in what period of time did the incident occur or is the incident continuing? (has the problem already occurred or will it occur soon; how long did it last, is it continuing ?)
- **Where** did the incident occur? (in which country, at which production site, at which company, at which supplier did the problem occur?)
- **Who** was involved and who is affected? (Person(s) involved in the matter or have knowledge of it and can give details, how many persons are affected, are you also affected yourself?)
- Has Südzucker been **notified of** the risk or breach before?
- If yes, **have measures been taken to** minimise or eliminate the risk or breach?

7 Who is responsible for processing the reports?

The persons entrusted with the whistleblower procedure at Südzucker Group are the compliance officer and, depending on the subject area of the report, the management of the respective central division or location.

Südzucker Group ensures that the persons entrusted with conducting the whistleblower procedure act impartially, are independent, are bound to absolute confidentiality and are not bound by professional instructions. Südzucker Group also ensures that the persons entrusted with conducting the whistleblower procedure are competent, receive appropriate training and have sufficient time resources to understand and assess the facts and the procedure from the perspective of the whistleblower.

8 How are whistleblowers protected?

8.1 Protection from disadvantage or punishment

Südzucker Group guarantees adequate and effective protection for the whistleblower against disadvantage or punishment. This applies if and to the extent that the whistleblower has provided information to the best of his or her knowledge and belief, i.e. if the whistleblower had reasonable grounds to believe that the information provided was true. The right to protection does not apply if the information provided is deliberately and knowingly false or misleading or if the information was improperly provided.

8.2 Maintaining the confidentiality of the identity of the whistleblower and data protection requirements

Südzucker Group shall ensure that the confidentiality of the identity of the whistleblower and any third parties named in the whistleblowing is maintained.

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

9 What happens after a report is submitted ?

The individual steps of the whistleblowing procedure are explained in more detail below. All information received is carefully examined and processed within the framework of the whistleblower procedure. As a rule, the processing takes place in the following steps:

9.1 Acknowledgement of receipt of the report to the whistleblower

If the whistleblower provides a means of contact, he or she will receive an acknowledgement of receipt within seven days of submitting the whistleblower's report. The acknowledgement of receipt will be sent via the same reporting channel through which the message was originally reported.

9.2 Examination of the notice

For all reports that are not received anonymously, Südzucker Group and the whistleblower will discuss the facts. If the discussion of the facts determines that the report is justified, Südzucker will take appropriate preventive and/or remedial action.

If the information is unfounded, Südzucker Group will discontinue the proceedings. A report is unfounded, for example, if no violation of applicable law or Südzucker Group's internal guidelines has been identified or if a report has no connection with the company or its business partners.

9.3 Information on the status / outcome of the whistleblowing procedure

If the whistleblower has provided a contact option, as a rule, he or she will receive information on the progress of the investigation within thirty days of the confirmation of receipt. Within three months at the latest, the whistleblower will receive information on the result of the investigation and, if applicable, on remedial and preventive measures taken. The whistleblower will also be informed if the proceedings have been discontinued due to the unfoundedness of the report.

Information shall only be provided if it does not affect internal enquiries or investigations or the rights of the persons who are the subject of a reference.

10 How long will the information be kept?

The documentation of the tips must be deleted two years after the conclusion of the whistleblowing procedure in the case of tips on compliance violations. For tips on human rights or environmental risks or violations, the retention period is seven years. Stored data shall be kept in accordance with the applicable data protection regulations.