Rules of procedure for EDEKA Group companies for the complaints procedure in accordance with the Supply Chain Due Diligence Act [LkSG]

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1. Introduction

EDEKA Group companies and their entities are committed to upholding human rights and protecting the environment. Management have declared observing, protecting and promoting human rights and protecting the environment along the entire value chain as key objectives for the Group. Any breaches against human rights enshrined in international law or against national or international environmental regulations will not be tolerated. EDEKA Group companies take suitable, reasonable action to identify, verify and prevent the emergence of risks relating to human rights and the environment in their own operations and throughout the entire supply chain. Part of upholding our due diligence in relation to human rights and environmental protection involves setting up an effective LkSG complaints procedure that people can use to report violations, risks and other issues.

These rules of procedure explain the process for submitting and handling tips received in relation to the LkSG. They describe the LkSG complaints procedure, who is responsible for LkSG complaints procedures, the specific process to follow once a complaint is received and what action needs to be taken to protect complainants. The LkSG complaints procedure is designed to allow people to get in touch easily and safely to detect any risks related to human rights or the environment and violations in the supply chain at an early stage to minimise and avoid any breaches found to have occurred.

2. Objectives and scope of the LkSG complaints procedure

The LkSG complaints procedure for EDEKA Group companies makes it possible to report risks related to human rights and the environment as well as legal violations arising from the business activities of an EDEKA Group company in its operations or the operations of a supplier.

In this sense, the LkSG complaints procedure and related setup of a reporting channel for tips relating to risks or breaches acts as an early warning system within the supply chain. The procedure can be used by all potentially affected parties, including employees of the EDEKA Group company along with all other individuals throughout the entire supply chain.

With the LkSG complaints procedure, EDEKA Group companies are able to counter impending legal violations at an early stage by taking preventative action or find a remedy for violations that have already occurred.

The LkSG complaints procedure for EDEKA Group companies can be used for complaints relating to all human rights and environmental risks or legal violations set out in Section 2(2) and (3) LkSG.

Bans related to human rights include:

- Child labour (generally the ban on employing children under the age of 15);
- Forced labour;
- Slavery, sexual exploitation;
- Failure to comply with health and safety regulations under the law on the place of employment;
- Failure to pay an adequate salary;
- The use of private or public security forces if they are inadequately controlled and the ban on torture or degrading treatment is therefore violated as a result;
- The contamination of soil, bodies of water, air and excessive water consumption;
- The unlawful eviction from or expropriation of land, forests or bodies of water;
- Any act or omission that is likely to impair a legal position to a particularly seriously extent, the unlawfulness of which is evident (general clause).

Bans related to environmental protection include:

- Ban on the manufacture of mercury-added compounds;
- Ban on the use of mercury in manufacturing processes;
- Ban on the improper treatment of mercury waste;
- Ban on the production and use of certain chemicals and persistent organic pollutants (POPs);
- Ban on the non-environmentally friendly handling, collection, storage and disposal of waste;
- Various bans on the export and import of certain hazardous waste.

3. Central reporting body for EDEKA Group companies

EDEKA ZENTRALE Stiftung & Co. KG (**EDEKA Zentrale**) has set up a central reporting body for EDEKA Group companies to which any complaints related to human rights or environmental risks or legal violations in accordance with the Supply Chain Due Diligence Act [LkSG] can be submitted, anonymously if desired.

EDEKA Zentrale has established the LkSG Complaints Service to handle complaints. Employees of the LkSG Complaints Service work on the basis of instructions issued and are bound to secrecy.

The LkSG Complaints Service handles complaints in cooperation with the corresponding departments affected by the complaint at EDEKA Group companies.

4. LkSG complaints procedure

If an individual would like to submit a complaint related to human rights or the environment or legal violations because they have been affected by an incident or become aware thereof, they can submit their complaint using the LkSG reporting platform for EDEKA Group companies.

4.1 Submitting a complaint on the LkSG reporting platform

Links to the LkSG reporting platform for the LkSG complaints procedure can be found on the EDEKA Group website https://verbund.edeka and on www.edeka.de in the footer on each page (link Human Rights).

The reporting platform is available in several languages and can be accessed around the clock, allowing reports to be submitted at any time. There are no costs involved in submitting a complaint on the platform.

Complaints can be submitted confidentially or anonymously. The status of complaints submitted on the platform can be viewed on the internet-based reporting portal.

If a complaint is submitted anonymously, data that would permit conclusions to be drawn about the identity of the complainant is not collected. If the complainant discloses information that permits conclusions to be drawn about their identity when submitting a complaint anonymously, the corresponding information will be handled confidentially.

When a complaint is submitted, all personal data and other information that permits conclusions to be drawn about the identity of the complainant is treated as confidential.

When complaints are submitted anonymously, the complainant will receive a process number to track the status of their complaint. If they lose this number, they will no longer be able to track the process. However, this does not affect the further processing on the complaint, unless there are questions that can no longer be answered by the complainant as a result.

4.2 Reviewing complaints

The complaint is recorded in the reporting service system and therefore received by the LkSG Complaints Service.

Confirmation of receipt is sent to the complainant within statutory deadlines. If necessary, the LkSG Complaints Service will also clarify any initial questions relating to the case with the complainant.

The complaint is then passed on to the corresponding departments at the EDEKA Group companies affected by the complaint for further processing. Information, particularly personal data or the identity of the complainant, if known, will only be passed on when necessary for handling the case. Data will be treated as confidential at all times.

The department at the affected EDEKA Group company responsible for processing the case is in charge of determining the next steps. If necessary, the LkSG Complaints Service will get in touch with the complainant by sending a message (potentially anonymously) to clarify the facts of the case.

Once the facts of the case have been clarified, the affected company takes suitable action to remedy any violations. The duration of measures introduced may vary depending on the case at hand. By allowing the complainant to get in touch with the LkSG Complaints Service at any time, information on the status of processing can also be obtained at any time.

The LkSG Complaints Service is in charge of deciding when a complaints procedure is complete. In the case of legal implications, the team consults the lawyers at EDEKA Verband kaufmännischer Genossenschaften e.V.

4.3 Responding to the complainant

Once the LkSG Complaints Service has reviewed a complaint, the complainant will be informed of the outcome and, where permitted by law, the further handling of the complaint and any preventative or remedial measures taken where necessary. If the complainant fails to respond to enquiries and information requested cannot otherwise be obtained by the LkSG Complaints Service, the LkSG Complaints Service will also inform the complainant and conclude the case.

5. Contact information for LkSG complaints procedures

The contact partner for LkSG complaints procedures at EDEKA Group companies in accordance with the Supply Chain Due Diligence Act is:

EDEKA Zentrale Stiftung & Co. KG
LkSG Complaints Service
New-York-Ring 6
22297 Hamburg

Contact: humanrights.edeka

6. Confidentiality of identity to avoid discrimination or punishment

Anonymous communications are possible throughout the entire LkSG complaints procedure. The confidentiality of communications is guaranteed at all times to ensure the complainant does not suffer any negative consequences. Protecting the complainant is given highest priority. This means that the complaint can only be read by the complainant and employees in the LkSG Complaints Service. The platform operators are not able to read any of the content. IP addresses are also not recorded.

7. Documentation of LkSG complaints

Complaints are stored for seven years in accordance with Section 10(1), clause 2 LkSG.