

# DALLMAYR GROUP COMPLAINTS MECHANISM RULES OF PROCEDURE

The family-run Dallmayr Group under the umbrella of Alois Dallmayr KG (hereinafter the individual companies and the group of companies as a whole are referred to as "Dallmayr") operates internationally in numerous markets. Dallmayr is committed to respecting and strengthening internationally recognized human rights and environmental obligations. In this respect, Dallmayr's responsibility is firmly embedded in its corporate strategy and applied, and is actively lived and implemented in our own business units as well as through appropriate management along the supply chain.

To fulfil its human rights and environmental due diligence obligations, Dallmayr has further implemented the requirements of the Act on Corporate Due Diligence obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG). One core element of the due diligence obligations is the establishment of an effective complaints mechanism by which complaints about human rights and environmental risks or possible violations can be submitted.

These rules of procedure provide information on the key features of the complaints mechanism, how to access the mechanism respectively the availability of the complaints mechanism. It also provides information regarding the handling of incoming complaints and reports. Transparency of the complaints mechanism is important for Dallmayr. For this reason, the following rules apply througout the process.

#### WHAT IS THE PURPOSE OF THE COMPLAINTS PROCEDURE?

As an "early warning system", the complaints mechanism is intended to give any person or group of persons the opportunity to report violations of human rights and related environmental standards.

Further, persons and groups of persons are also given the opportunity to report the risk of a legal infringement so that damage can be averted or minimized.

# WHO CAN USE THE COMPLAINTS PROCEDURE?

Any internal or external organization or person from Germany or abroad can report complaints, regardless of whether they are directly or indirectly affected.

## WHAT TYPES OF COMPLAINTS CAN BE REPORTED?

The complaints mechanism can be used to report all complaints of violations and risks of violations regarding human rights or related environmental standards. The complaint may either relate to Dallmayr's own business area or the supply chain.



## WHICH COMPLAINTS CHANNELS CAN BE USED TO SUBMIT COMPLAINTS?

Complaints regarding potential violations of human rights and related environmental standards can be submitted at any time free of charge via the complaints channels listed below. All complaints, regardless of how Dallmayr receives them, will be processed immediately and in the same way.

The following channels can be used to submit complaints to Dallmayr:

## Online reporting channel:

Dallmayr provides a digital complaints system through which complaints can be entered into a web form. It can be used in several languages. The complaints system can be reached at [Alois Dallmayr KG | Inicio].

#### Via mail to:

Alois Dallmayr KG Sustainability Dienerstr. 14-15 D-80331 Munich Germany

# WHO HANDLES COMPLAINTS AT DALLMAYR?

Dallmayr ensures that complaints are handled by responsibly selected and specially trained Dallmayr employees. These employees are impartial, independent, not bound by instructions, bound to confidentiality and given sufficient time resources.

# HOW DOES THE COMPLAINTS PROCEDURE WORK?

#### Receipt of the complaint:

Once the complaint has been received, the informant receives an acknowledgement of receipt, regardless of the chosen complaint channel. Dallmayr remains in contact with the informant throughout the entire process, if desired, and if a contact option is available. If the complaint is received via mail and a contact option has been specified, confirmation of receipt will be sent via the specified channel. Communication always takes place in consideration of the legally protected interests of other persons and companies (e.g. data protection requirements, confidentiality obligations).

#### Examination of the complaint in accordance with the law:

After receiving of the complaint, a formal review is carried out to determine whether the complaint is related to a violation of human rights or related environmental standards. In addition, it is determined which Dallmayr company or which of its business partners is affected by the complaint. The complaint is then passed on to the responsible department within Dallmayr. If the complaint is rejected, the informant will be informed with a statement of reasons. The complaints procedure will only be rejected if (after consultation with the informant) there are no sufficient indications for the suspicion of infringement of regulations or relevant risks or if further processing of the facts would be legally inadmissible.

# Communication to clarify the facts:

Further the facts must be clarified. Dallmayr's aim is to determine if an infringement of human rights or environmental standards has already occurred or is imminent. If the informant has provided a contact option, contact will be made if necessary to clarify the facts.

## • Initiation of remedial measures:

If the complaint is confirmed, Dallmayr will initiate remedial measures without delay. With regard to the remedial and preventive measures, it is particularly important to consider the expectations of the informant.



## • Implementation and review of the effectiveness of the measures:

The employees responsible for the complaints procedure will continuously check whether the remedial measures have been successfully implemented.

## Complaint solved, communication at the end of the complaints procedure:

The informant is finally informed of the results of the procedure, irrespective of whether or not the identity of the informant is known. The communication takes place via the original complaint channel.

As a result, the processing time is highly case-dependent and can take from a few days to several months. However, it is Dallmayr's aim to conclude the complaints procedure in a timely manner.

## HOW IS THE PROTECTION OF INFORMANT ENSURED?

The protection of the informant from discrimination or reprisals is an essential part of Dallmayr's complaints procedure. For this reason, Dallmayr conducts investigations in a way that protects the identity of the informant. Even if suspicions are not substantiated, the informant does not have to fear any negative consequences, provided the complaint was made in good faith.

The measures listed below serve to ensure the protection of the informant.

## • Identity protection and confidentiality:

Dallmayr uses an IT-based secure filing system for documenting and archiving reported cases, incl. corresponding communication documentation on misconduct. Only the resposible employees have access to the complaints files.

Employees responsible for handling complaints must treat all information received as highly confidential. They are strictly prohibited from disclosing any information to third parties within and outside Dallmayr, unless this is permitted or required by law.

#### • Protection of the informant against reprisals and discrimination:

Dallmayr prohibits any form of discrimination and intimidation against the informant. Retaliation against the informants and/or their employees are strictly prohibited. The responsible employees remain in contact with the informant after the procedure has been completed, if desired, to ensure the best possible protection against discrimination and reprisals.

#### Impartiality of those responsible:

The impartiality of the persons entrusted with the complaint procedure is guaranteed by the principle of dual control and the professional independence of instructions.

