

DMK whistleblowing system

1. Preamble

DMK Group¹ has set up a whistleblowing system to receive reports. Within this framework, there are different reporting offices, reporting channels and an external ombudsman. Reporting offices exist in accordance with the Whistleblower Protection Act (HinSchG) and the Supply Chain Due Diligence Act (LkSG).

The companies of DMK Group ensure responsible and careful handling of all reports, ensure neutral and objective handling and careful examination of potentially required measures.

The respective reporting offices fulfill the legal requirements applicable to them.

This publicly accessible regulation of procedure explain who can report which facts, how this is done in detail, which procedural steps are envisaged and what happens and must be observed after a whistleblower report.

2. Whistleblowers

Reports can be submitted by all employees and third parties (e.g. business partners), including affected persons who have become aware of human rights and environmental risks and violations of human rights or environmental obligations in connection with the activities of DMK Group (hereinafter referred to as "**whistleblowers**").

3. Possible content of whistleblower reports

All matters that violate the law can and should be reported.

4. Reporting office and channels, ombudsman, communication

a. Reporting channels

- by e-mail or in writing to Group Compliance at compliance@dmk.de

¹ DMK Deutsches Milchkontor GmbH and its affiliated companies that are fully consolidated in DMK's consolidated financial statements or not included in the consolidated financial statements in accordance with Section 296 (2) sentence 1 HGB.

- via the secure mailbox of the digital reporting platform of DMK [Meldeplattform - DMK Deutsches Milchkontor GmbH \(sicher-melden.de\)](#)
- verbally/ by telephone/ by e-mail or in writing to the external ombudsman using the following contact details

Kanzlei Zenk Rechtsanwälte Partnerschaft MBB

Main contact person:

Andreas Lützen

Mail: ombudsstelle-dmk@zenk.com

Neuer Wall 25/ Schleusenbrücke 1, 20354 Hamburg

Phone: 040/22664-222

b. Reporting offices

Group Compliance is the internal reporting office for reports under the Whistleblower Protection Act and complaints under the Supply Chain Due Diligence Act. The external Ombudsman is a reporting office for reports under the Whistleblower Protection Act and passes on complaints under the Supply Chain Due Diligence Act to the internal reporting office.

c. Communication

Employees can find more information on the intranet under [whistleblower system \(sharepoint.com\)](#) and on the Internet at [Compliance | DMK Group](#).

If reports are submitted anonymously on the digital reporting platform, the internal reporting office or supporting persons at DMK can communicate with the whistleblower in the secure mailbox and hereby keep anonymity.

If the report is received in person by the reporting offices (Group Compliance or the ombudsman) and the whistleblower has provided a contact option, both parties have the opportunity to ask questions and discuss the reported facts and the processing status of the whistleblower report.

The possibility of personal meetings exists regardless of the choice of reporting channel.

5. Confidentiality

The confidential treatment of all information and data provided to the Reporting Office will be ensured as far as possible, if and insofar as desired. This applies in particular to the identity and personal data of the person making the report and the person(s) affected by the report.

Only individual, pre-defined, authorized persons have access to incoming whistleblower reports and information about the processing of the whistleblower report. These responsible persons are contractually bound to confidentiality. The same applies if, in individual cases, a further support function is called in to clarify or assess a matter.

Despite the maintenance of agreed confidentiality, personal data of the reporting and affected persons may come to the knowledge of authorities, courts or third parties in exceptional situations. This is particularly the case if the disclosure of this information to them is mandatory for the respective company, for example in the context of an official investigation (such as a preliminary investigation) or if this is necessary for the assertion, exercise or defense of legal claims. In addition, the reported information must also be disclosed to the persons affected by the whistleblower report under certain conditions.

In these cases of disclosure of the reported information, the whistleblower - insofar as their identity and / or contact details are known - will be informed of the disclosure and the reasons for it before the disclosure is made to third parties. This notification will only be omitted if it would jeopardize the official investigation.

6. Acting impartially

All responsible persons involved in the whistleblower report or in the investigation of the facts act impartially, independently and without influence when processing the whistleblower report and are not bound by instructions regarding their activities in connection with the proceeding of whistleblower reports.

7. Processing of the whistleblower report and follow-up measures

Once the whistleblower report has been received, it is recorded and processed further.

If necessary, follow-up measures (preventive and corrective measures) are initiated after reviewing the whistleblower report.

The procedure following receipt of a whistleblower report usually provides for the following steps - subject to other / further legal regulations applicable in individual cases:

a. Confirmation of receipt and protocol check²

The whistleblower will receive a confirmation of receipt immediately, at the latest within seven days of receipt of the report.

If the contents of a (verbal) report have been recorded or protocolled, the whistleblower is also given the opportunity to review the record or protocol, correct it if necessary and confirm it with their signature or in electronic form.

b. Filtering and control, report

Upon receipt of the report, the internal reporting office checks the reported facts for validity and credibility on the basis of the facts provided.

Further processing of the received, credible and valid information (forwarding the facts to the responsible office in the company, clarification of the facts, taking follow-up measures) will only take place if this is provided for by law and/or legally permissible.

Inconclusive, incomprehensible, unsubstantiated or unbelievable whistleblower reports will not be processed further (so-called groundless whistleblower reports). Where possible, the whistleblower will be informed that their report has not been processed further.

If the ombudsman receives the report, it is anonymized before being forwarded to the internal reporting office and the whistleblower's consent is obtained in advance. Further communication with the whistleblower takes place exclusively through the ombudsman.

If the report is received via the secure reporting platform, the report can be submitted anonymously and the whistleblower can still be communicated with anonymously via the secure mailbox. Further information can be found on the reporting platform at [Reporting platform - DMK Deutsches Milchkontor GmbH \(sicher-melden.de\)](https://www.sicher-melden.de)

² If no contact details are provided by the whistleblower as part of the whistleblower report, confirmation of receipt and review of the report cannot take place.

When processing a report, the internal reporting office can call in other responsible, supporting or advisory functions if necessary. The protection of confidentiality and the assurance that the responsible persons are not bound by instructions is ensured by corresponding written agreements, see also Chapter 5 Confidentiality.

c. Follow-up measures

As part of the whistleblowing process, the responsible persons in the company check which follow-up measures are to be taken, depending on which areas and persons are affected by the whistleblowing. The follow-up measures may range from internal/external investigations or the commissioning of such investigations, to referral to other competent bodies, to the closure of the investigation due to lack of evidence.

d. Final feedback

If the whistleblower has provided a contact option or the report has been received via the secure reporting platform, they will receive a response no later than three months after confirmation of receipt of the report indicating what follow-up measures are planned or have been taken with regard to their report.

e. Data protection

The submission of reports via the various reporting channels is voluntary. The processing of personal data in particular with regard to the personal data of the whistleblower and persons affected by the whistleblower report takes place in compliance with the data protection regulations of the General Data Protection Regulation and the Federal Data Protection Act.

8. Regulatory protection

Whistleblowers who report suspicions about a reportable matter are protected. They may not and will not be reprimanded for their whistleblowing report.

Persons providing information do not have to fear any adverse consequences under criminal law, civil law or labor law. This also applies if a tip-off subsequently proves to be unjustified.

However, this does not apply if whistleblowers deliberately and intentionally or through gross negligence report false information. In this case, the respective DMK Group company involved reserves the right to take civil, labor and criminal action against the person who deliberately made the false report to the extent permitted by law.