

## **Rules of Procedure**

for complaints pursuant to Section 8 of the German Supply Chain Due Diligence Act (LkSG)

### **1. Introduction**

These rules of procedure are binding for incoming complaints regarding human rights and environmental risks as well as breaches of duty for the bodies and employees of the Pfeifer & Langen Sugar Group ("Pfeifer & Langen").

The aim of the Code of Conduct is to describe rules and processes for reporting, investigating and clarifying human rights risks or violations in the supply chain. Complaints can be submitted by employees, business partners and other whistleblowers. This also includes complaints about risks and violations that may have resulted from the actions of our suppliers' subcontractors.

Pfeifer & Langen encourages everyone to report observed risks or violations of due diligence obligations in the company's supply chain on human rights and environmental issues.

The effectiveness of this procedure is monitored regularly and reviewed at least once a year.

### **2. Subject of the complaints**

The areas in which human rights and environmental risks or violations ("incidents") can be reported include, among others:

- Child labour
- Slavery and forced labour
- Discrimination
- Unlawful confiscation of land
- Occupational safety and related health hazards
- Withholding an appropriate wage
- Violations of the right to form trade unions and employee representative bodies
- Causing harmful soil change or water pollution
- Torture
- Non-environmentally sound handling, collection, storage and disposal of hazardous waste

### **3. Complaints channels**

Whistleblowers have various options for submitting complaints. This can be done in writing or verbally, typically via our electronic whistleblowing system BKMS, e-mail, telephone, letter or as part of a personal meeting.

### **3.1 Electronic whistleblowing system BKMS**

The electronic whistleblowing system (BKMS system): BKMS® is a web-based system from Business Keeper GmbH (part of EQS Group AG). The system can be accessed from any internet connection at the web address <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=nhMn5W&c=-1&language=eng> BKMS is a certified and standardised system with the highest possible data and access security. There is a secure connection and the content is encrypted. BKMS is available in various languages. Reports via BKMS can be submitted by name or anonymously. Even with anonymous reports, you can receive and leave messages via a "mailbox" in the system after submitting the report. However, experience has shown that in many cases the investigation of incidents is more successful and faster if the report is submitted by name. Details are provided during the reporting process. BKMS is a compliance reporting system from Group Compliance, i.e. the Chief Compliance Officer of Pfeifer & Langen, based in Cologne, Germany. After submitting the report, the Chief Compliance Officer receives a notification of receipt from the BKMS system.

### **3.2 Other reporting channels**

Alternatively, reports can be submitted to us as follows:

E-mail: [compliance@pfeifer-langen.com](mailto:compliance@pfeifer-langen.com)

Phone: +49 (0)221 4980 333

#### **By post to:**

Pfeifer & Langen GmbH & Co. KG  
Chief Compliance Officer  
Private/confidential, do not open  
Aachener Str. 1042a  
50858 Cologne  
Germany

## **4. Processing of notices**

Reports to the above-mentioned channels are processed and documented by the person entrusted with the implementation of the procedure. The person in charge guarantees impartiality and is obliged to maintain confidentiality within the framework of the legal provisions.

If the whistleblower has provided a means of contact, receipt of the report will be confirmed within seven days. In this case, the person in charge of the procedure will also contact the whistleblower to discuss the facts of the case. They will then check the relevance and validity of the report, request further information from the whistleblower if necessary and liaise with them. If necessary after clarification of the facts, Pfeifer & Langen will take appropriate remedial action regarding the incident. The person in charge of implementing the procedure will provide the whistleblower with feedback on the matter within a reasonable period of no more than three months.

Reports are treated confidentially within the framework of the legal provisions. Pfeifer & Langen may involve other functions within or outside the company (such as other departments for internal advice on specific topics, business partners for information, lawyers for legal advice) in addition to the persons entrusted with the procedure, if necessary.

Whistleblowers acting in good faith are protected from disadvantage or punishment within the framework of the legal provisions.

In accordance with Section 10 (1) LkSG, documentation is kept for at least seven years.

## **5. Contact us**

For further questions, please contact [compliance@pfeifer-langen.com](mailto:compliance@pfeifer-langen.com).