



ROTKÄPPCHEN-MUMM

# RULES ON THE COMPLAINTS PROCEDURE PURSUANT TO THE SUPPLY CHAIN DUE DILIGENCE ACT

Under the German Supply Chain Due Diligence Act (LkSG), Rotkäppchen-Mumm Sektkellereien GmbH is obliged from January 1, 2024 to comply with human rights and environmental due diligence obligations in its supply chains and its own business operations in an appropriate manner.

According to § 8 LkSG, a complaints procedure must be set up. The procedure enables internal and external persons to draw attention to human rights and environmental risks and violations of human rights or environmental obligations.

This document describes in more detail the complaints procedure of Rotkäppchen-Mumm Sektkellereien GmbH in accordance with the LkSG.

## I. FOR WHAT KIND OF COMPLAINTS OR NOTICES CAN THE PROCEDURE BE USED?

Complaints and notices on the following risks or violations of obligations can be reported in the case category "Violation of human rights and environmental obligations or related risks".

Human Rights Risks and Breaches of Duty: Child labour, forced labour, slavery, disregard for occupational health and safety and work-related health hazards, disregard for freedom of association, unequal treatment, withholding of fair wages, destruction of natural resources through environmental pollution, unlawful violation of land rights, use of private or public security forces in violation of human rights, other conduct that seriously impairs protected legal positions.

Environmental Risks or Breaches of Duty: Failure to comply with environmental protection prohibitions (Minamata Convention, Stockholm Convention, POPs Convention, Basel Convention).

Complaints and notices must relate to risks or breaches of duty that have arisen as a result of the business activities of Rotkäppchen-Mumm Sektkellereien GmbH, including its subsidiaries, in its own area of operation or those of a direct or indirect supplier.

## II. WHICH COMPLAINT CHANNELS CAN BE USED FOR NOTICES OR COMPLAINTS FOR THE PROCEDURE?

The central channel for complaints and notices is an electronic whistleblowing system. This is available online at the following link and can be used free of charge by the referring parties: Whistle Report ([whistle-report.com](https://whistle-report.com))

External persons are informed about this on the Rotkäppchen-Mumm Sektkellereien GmbH website. Employees of Rotkäppchen-Mumm Sektkellereien GmbH are also informed about the existing complaints channel via the internal portal.

### III. HOW DOES THE COMPLAINTS PROCEDURE WORK?

Complaints and notices are reported by the whistle-blowers in the electronic whistleblowing system in German or English Whistle Report (whistle-report.com). Whistle-blowers receive a confirmation of receipt if they have entered their contact details in the whistleblowing system so that they can remain in contact with the whistle-blower anonymously.

#### 1. THE CLEARING OFFICE AND ITS TASKS

Notices submitted via the electronic whistleblowing system first reach the so-called "Clearing Office". This centre has been set up by a law firm commissioned by Rotkäppchen-Mumm Sektkellereien GmbH. This law firm makes available two persons to handle the tasks of the Clearing Office.

The Clearing Office has the task of conducting a cursory examination to determine whether a report falls into the case category "violation of human rights and environmental obligations or related risks". The Clearing Office clarifies the facts of the case by making inquiries with the whistle-blowers to such an extent that it can determine whether there is probable cause of a violation of human rights and/or environmental obligations or a corresponding risk within the meaning of LkSG.

If the Clearing Office's investigation does not reveal any probable cause, the proceedings will be discontinued and the whistle-blowers informed accordingly. No other persons shall be informed about the facts described in the notice.

If the Clearing Office comes to the conclusion that there is a probable cause of a violation of human rights and/or environmental obligations or a corresponding risk, the information, including further notices available to the Clearing Office, shall be reported to the Clearing Office, where it shall be forwarded to the responsible internal officers at Rotkäppchen-Mumm Sektkellereien GmbH. Further processing and clarification will be carried out internally within Rotkäppchen-Mumm Sektkellereien GmbH by the Human Rights Officer and his representative.

With the announcement of the audit result to the whistle-blowers or the forwarding of the process to the internal representatives at Rotkäppchen-Mumm Sektkellereien GmbH, the procedure at the Clearing Office shall be deemed complete.

#### 2. ROTKÄPPCHEN-MUMM SEKTKELLEREIEN GMBH'S INTERNAL REPRESENTATIVES AND THEIR TASKS

The persons entrusted by Rotkäppchen-Mumm Sektkellereien GmbH with the processing of the notices may act independently and impartially in the processing and are not bound by instructions. They shall also be bound to confidentiality.

If probable cause is confirmed through further processing by Rotkäppchen-Mumm Sektkellereien GmbH's internal representative, and if a grievance is identified in one of its own departments, remedial measures shall be taken with the involvement of the corresponding internal departments to immediately reduce the risk or to immediately remedy the issue and to avoid its recurrence.

If the notice or complaint relates to an indirect supplier, contact will be made with the supplier via the responsible buyers and supplier discussions will be held. If probable cause is confirmed, a concept for ending or minimizing the violation will be drawn up and implemented with the involvement of Rotkäppchen-Mumm Sektkellereien GmbH's purchasing department and the supplier. The same procedure shall apply in the event of indications or violations at an indirect supplier.

The whistle-blowers are contacted by the internal representatives for any further queries and informed

about the processing of the matter and the outcome. The duration of the procedure may vary depending on the scope and complexity of the complaint.

### 3. EFFECTIVENESS OF THE COMPLAINTS PROCEDURE

This procedure is reviewed for effectiveness at least once a year or on an ad hoc basis. If necessary, amendments shall be made to the process or corrective measures shall be taken.

## IV. HOW IS EFFECTIVE PROTECTION OF ANONYMITY AND AGAINST DISCRIMINATION OR PUNISHMENT BASED ON A COMPLAINT GUARANTEED?

### Protection of Anonymity

The whistle-blower system is administered online via a standardized system equipped with a high level of data and access security. The system is technically designed in such a way that there is no way for Rotkäppchen-Mumm Sektkellereien GmbH, its employees or the Clearing Office to identify the whistle-blowers. Processing shall take place via external servers of a third-party provider, which are operated at a location known only to this provider and correspond to the highest security class.

The Clearing Office and, once the information has been released, the internal officers are technically able to communicate with the whistle-blowers via the system while maintaining anonymity. In this way, further necessary questions can be asked and narrowed down if necessary. Whistle-blowers also have the option of deliberately choosing not to remain anonymous.

### Protection of employees

The internal company agreement on the whistle-blower system stipulates that whistle-blowers may not be personally or legally disadvantaged for reporting a LkSG-relevant grievance. Likewise, complaints against employees that have turned out to be fruitless must not lead to personal or legal disadvantages for the falsely reported person. Personal data may be stored or retained for a maximum period of three years.

