



Original Wagner Pizza GmbH

Rules of Procedure regarding reports submitted under the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

1. Introduction

We - Original Wagner Pizza GmbH - are part of the European Pizza Group and thus one of the largest manufacturers of frozen pizzas in Europe. We consider compliance with laws and internal guidelines, and respect for human rights and environmental standards, to be key principles of entrepreneurial and sustainable behaviour. We expect the same from our business partners in their areas of business in which they operate and in their cooperation with their own business partners.

In order to have the opportunity to initiate appropriate remedial or preventive measures and, unless otherwise required by law, to avoid or at least minimise negative effects, it is particularly important for us to learn of any violations or potential risks that have arisen or could arise from our own business activities or the business activities of a supplier.

We are committed to regularly reviewing and improving the complaints process, and we reserve the right to amend our Rules of Procedure in the future. The latest version of these Rules of Procedure therefore apply.

2. Scope and aim

These Rules of Procedure describe the complaints process applicable to Original Wagner Pizza GmbH. In addition to the complaints process, it explains the applicable reporting channels, responsibilities and whistleblower protection.

The whistleblower system is open to all providers of information. This means that in addition to internal and external persons, in particular employees and business partners, other stakeholders (e.g. residents, neighbours) can also report actual or suspected violations of legal regulations and internal guidelines, in particular human rights and environmental risks as well as violations of human rights or environmental obligations arising from action taken in the company's own area of business or that of a supplier.

Original Wagner Pizza GmbH

(a) A violation of human rights obligations is understood to mean a breach of the prohibitions set out in Section 2(2), Nos. 1–12 of the LkSG. These prohibitions are summarised in the overview below, which is not exhaustive:

- Prohibition of child and forced labour and the prohibition of the creation of slave-like conditions
- Prohibition of disregard for occupational health and safety
- Prohibition of disregard of freedom of association (e.g. establishment of a trade union)
- Prohibition of unequal treatment based on personal characteristics
- Prohibition of withholding of an appropriate wage
- Prohibition of causing particularly harmful interference with nature (soil change, water or air pollution)
- Prohibition of unlawful forced eviction or unlawful seizure of land
- Prohibition of the commissioning or use of security services that commit violations of the law (e.g. torture, interference with freedom of association)

(b) A violation of environmental obligations is understood to be a breach of the prohibitions of Section 2 (3) Nos. 1 - 8 LkSG. These prohibitions are summarised in the overview below, which is not exhaustive:

- Prohibition of the manufacture of mercury-added products, the use of mercury in manufacturing processes, the improper treatment of mercury waste contrary to the Minamata Convention of 10 October 2013
- Prohibition of the production, use and non-environmentally sound handling of chemicals banned under the Stockholm Convention of 23 May 2001
- Ban on the export or import of hazardous waste within the meaning of the Basel Convention of 22 May 1989

The complete legal text of Section 2 (2) Nos. 1 - 12 LkSG and Section 2 (3) Nos. 1 - 8 LkSG can be found in Annex 1 of these Rules of Procedure.

3. Complaints process

3.1. Reporting/communication channels

Whistleblowers can use any of the following communication channels to submit a complaint:



Original Wagner Pizza GmbH

- (a) By e-mail to Compliance@pizzagroup.eu
- (b) By post to the following address:

Personal / Confidential

Original Wagner Pizza GmbH
Compliance Department
In den Schemeln 4
66620 Nonnweiler

- (c) Via the "SpeakUp" digital complaints system introduced by the European Pizza Group, or "EPG" for short, for all EPG companies. This system enables internal and external whistleblowers around the world to report risks and breaches of laws and internal guidelines. Reports can also be submitted anonymously if desired.

The whistleblower system is available around the clock and in many national languages.

Reports can be submitted via 'SpeakUp', either in writing online or by telephone. The reporting process via the digital whistleblowing system "SpeakUp" is explained in more detail in section 3.2.

3.2. Reporting process via "SpeakUp"

The two reporting channels via "SpeakUp" are explained below:

(a) Verbal reporting by telephone:

The whistleblower must select the whistleblowing system telephone number for their location. An overview of all available telephone numbers can be found in Annex 2, which also shows whether calls are free of charge or whether charges may be made by the telephone provider.

Example for Germany: Freephone: 0800 1818 952

After ringing the call number, the caller must enter the organisation code 124609.

The person providing the information is then connected to a voice computer, which initially provides information about how to continue as well as about the next steps. The message, which can be left with a name or anonymously, is recorded. The system assigns a unique report number and the whistleblower must specify a four-digit PIN code. The person providing the



Original Wagner Pizza GmbH

information must make a note of both numbers in order to remain in continuous contact with the system and to find out the processing status.

(b) Written report via the Internet:

Whistleblowers can access the Original Wagner Pizza GmbH whistleblower system via the following options:

- Via direct Internet access:
<https://epg.speakup.report/epg>

- Via the company homepage of Original Wagner Pizza GmbH(<https://www.original-wagner.de/>). To do this, the whistleblower must click on the "Compliance reports" button at the bottom of the homepage.
- Internal whistleblowers can also access the system via the company's own intranet. To do this, the whistleblower must select the "Complaints process| Compliance | SPEAK UP" button in the "Wagner Apps" section below.

Whistleblowers can create a report on the 'SpeakUp' start page by selecting 'New report' or they can log in via the 'Log in' button to access an existing report.

Once the language in which the whistleblower wants to submit the report has been selected, the system will assign a report number. The whistleblower must make a note of this number and create a password. The report number and password are needed to log in again later and, for example, to check whether a response has been made to the report or to add further information. Even though reports are made anonymously via this channel, the whistleblower can track the processing of their report and communicate with Original Wagner Pizza GmbH at any time.

Accompanying documents can also be uploaded via this reporting channel.

The Compliance Champions at Original Wagner Pizza GmbH will be notified by e-mail as soon as a report is submitted in "SpeakUp".

3.3. Complaints process principles and procedure

Reports are processed as follows. The Compliance Champions at Original Wagner Pizza GmbH are responsible for ensuring that information and



Original Wagner Pizza GmbH

complaints are properly investigated and clarified. Compliance Champions act independently and are obliged to be impartial and maintain confidentiality.

The entire process is carried out confidentially, in accordance with data protection rules and in a way that protects the identity of the person providing the information.

(a) Receipt of the complaint or tip-off

Depending on the communication channel used, the person providing the information will receive confirmation of receipt of the report within seven days, providing it is possible to contact them. Receipt of the report is documented.

(b) Investigation of the complaint or tip-off

The Compliance Champions first carefully check the report received. If the report does not contain sufficient information, the whistleblower will be contacted if possible and asked for further information. At the beginning of the process, the facts reported are checked to ensure they fall within the scope of these Rules of Procedure. If this is not the case, the person providing the information will receive feedback with a corresponding explanation.

(c) Clarification of the facts (investigation)

The clarification process begins once the initial check has been carried out by the Compliance Champions. Depending on the facts or circumstances of the report submitted, it may be necessary to involve other internal departments (e.g. Purchasing, Occupational Safety, Environment, Human Resources) in addition to the person providing the information, as well as suppliers or other persons assisting with the investigation.

(d) Outcome and conclusion of the process

If, after the results of the investigation have been reviewed, it is determined that a violation has occurred, corrective action will be taken. If necessary, preventive measures will be adapted. The measures and the duration of implementation depend on the nature and severity of the matter.

If it is possible to contact the person who provided the information, the whistleblower will be informed of the status or conclusion of the process no later than three months after the confirmation of receipt is received.

In the event of human rights or environmental risks or violations, the report must be kept for seven years. The retention period starts when the process is finished.



Original Wagner Pizza GmbH

3.4. Confidentiality and protection from discrimination and punishment

It is in the interest of Original Wagner Pizza GmbH to uncover and remedy any irregularities. Original Wagner Pizza is therefore committed to confidentiality and to protecting whistleblowers from discrimination and penalisation.

- (a) Original Wagner Pizza GmbH protects the anonymity of whistleblowers throughout the entire complaint process. Whistleblowers who wish to remain anonymous will not be identified.
- (b) All those responsible for processing a complaint are obliged to maintain confidentiality. No information relating to the tip-off or its clarification will be made available to third parties.
- (c) The reporting of violations of human rights or environmental obligations may involve the transfer of personal data.
- (d) Each notification and the measures taken must be documented by the Compliance Champion or the internal person from the department involved. This documentation is carried out confidentially and in compliance with all data protection regulations.
- (e) Whistleblowers who report human rights and environmental risks and violations of human rights or environmental due diligence obligations to the best of their knowledge and in good faith do not have to fear any adverse measures by the company as a result of the report. In the event of recognisable misuse of the Original Wagner Pizza GmbH complaints process, i.e. if criminally relevant notifications (for example: insults or defamation) are made, Original Wagner Pizza GmbH reserves the right to take legal action or disciplinary measures against the reporter.
- (f) Original Wagner Pizza GmbH also protects the rights of the accused person. The constitutional presumption of innocence applies until the opposite is proven.