

Rules of Procedure for Grievance Mechanism

RL 1.17-2

Letzte Änderungen:

1. Purpose

Hortiful is committed to conducting its business in a lawful, ethical, socially responsible, and environmentally sustainable manner.

This Grievance Mechanism enables individuals to report concerns regarding actual or potential violations of applicable laws, our Code of Conduct, human rights standards, environmental obligations, and other compliance-related requirements.

The purpose of the mechanism is to identify risks and violations at an early stage, investigate reported concerns appropriately, and implement suitable remedial and preventive measures.

2. Scope of Application

This mechanism applies to concerns related to:

- Violations of applicable laws and regulations;
- Violations of the Company's Code of Conduct;
- Bribery, corruption, fraud, theft, or other compliance violations;
- Human rights risks and violations;
- Child labour, forced labour, modern slavery, discrimination, harassment, or unfair treatment;
- Violations of occupational health and safety requirements;
- Environmental risks, environmental damage, or violations of environmental regulations;
- Violations of human rights or environmental due diligence obligations within the supply chain;
- Any other serious misconduct that may negatively affect individuals, communities, the environment, or the integrity of business operations.

The mechanism is not intended for routine commercial complaints, customer service matters, contractual disputes, pricing discussions, or operational business issues unless they involve compliance, human rights, or environmental concerns.

3. Who Can Submit a Report

The mechanism is available to:

- Employees of Hortiful GmbH & Co. KG;
- Former employees and job applicants;
- Suppliers, service providers, contractors, and other business partners;
- Employees of business partners;
- Individuals employed by companies within the supply chain of our business partners;
- Workers, local communities, rights holders, and other stakeholders who may be affected by our business activities or supply chains;
- Any person who becomes aware of a relevant concern related to our business activities or supply chains.

4. Reporting Channels

4.1. General Reporting Channel

Reports or complaints may be submitted through the following channels:

- E-mail: csr@hortiful.com (ESG Manager)
- Telephone: +49 6227 3582790
(There is an option to leave a message)
- Postal mail: Hortiful GmbH & Co. KG, Robert-Bosch-Str. 35, 69190 Walldorf, Germany
Please mark envelope: Confidential / ESG Manager

All reports and messages are received and handled by the ESG Manager, who acts as the designated responsible function for this mechanism. The ESG Manager is not identified by name in order to ensure continuity of the reporting process regardless of changes in personnel.

Reports may be submitted anonymously where permitted by applicable law. However, reporting persons are encouraged to provide contact details to facilitate communication and investigation.

The postal address is provided in particular to ensure accessibility for individuals in Germany and other jurisdictions where written reporting options are required under applicable whistleblower protection legislation (including the German Whistleblower Protection Act — Hinweisgeberschutzgesetz).

4.2. Internal Reporting Channel for Employees

In addition to the general reporting channels described in Section 4.1, Hortiful GmbH & Co. KG provides its own employees with a dedicated internal reporting channel. This channel is available exclusively to employees of Hortiful GmbH & Co. KG and is intended for the confidential reporting of concerns relating specifically to internal workplace and conduct matters.

The internal employee channel may be used to report concerns regarding:

- Discrimination, bullying, or harassment;
- Leadership behaviour and management conduct;
- Working conditions or work overload;
- Health and safety in the workplace;
- Ethical misconduct, such as corruption or conflicts of interest;
- Violations of applicable laws or regulations;
- Other violations of company values or internal policies.

Reports submitted through this channel are handled in accordance with a separate internal process description, which sets out the specific steps, responsibilities, and escalation paths applicable to employee concerns. This internal process description is intended for internal use only and is not shared externally as a general rule.

The existence of this dedicated channel does not limit employees' right to use the general Grievance Mechanism described in this document, or to contact external reporting authorities where applicable.

5. Principles of the Procedure

All reports are handled according to the following principles:

Confidentiality

The identity of reporting persons and all individuals concerned by a report will be treated confidentially and protected in accordance with applicable legal requirements.

Fairness

All parties involved will be treated fairly and impartially. Allegations will be assessed objectively and without prejudice.

Protection Against Retaliation

Hortiful does not tolerate retaliation against any person who raises concerns or submits a report in good faith.

Retaliation, discrimination, intimidation, threats, or other adverse treatment against reporting persons is strictly prohibited.

Accessibility

The mechanism is available to internal and external stakeholders and may be used without fear of retaliation.

6. Procedure

Receipt of Report

Upon receipt of a report, the person responsible will review the information and determine whether the reported matter falls within the scope of this procedure (cf. Section 2).

Confirmation of receipt will be provided to the reporting person within seven (7) days of receipt, where contact details are available. In the case of anonymous reports where no contact details are provided, confirmation of receipt may not be possible.

Ongoing Communication

Through the handling of a report, the responsible will maintain contact with the reporting person, keeping them informed of the progress of the procedure to the extent permitted by law and without prejudicing the investigation or the rights of persons concerned by the report.

Assessment and Investigation

The reported concern will be assessed for plausibility and, where appropriate, investigated by qualified and independent persons.

If further information is required to assess or investigate the reported concern, the reporting person will be contacted accordingly.

Legal Support

In critical or legally complex cases, Hortiful GmbH & Co. KG works in close cooperation with law firm **RSM Ebner Stolz** to ensure that the investigation is conducted in a legally sound and professionally competent manner. Law firm **RSM Ebner Stolz** may be engaged in particular where:

- The reported concern involves potential legal liability for Hortiful GmbH & Co. KG or its representatives;
- The matter requires legal assessment under applicable national or international law;
- Regulatory authorities may need to be involved;
- The complexity or sensitivity of the case warrants external legal expertise.

The engagement of law firm **RSM Ebner Stolz** is subject to applicable confidentiality obligations. Any sharing of information with external legal counsel will comply with applicable data protection laws.

Zero-Tolerance Cases

Certain categories of violations are classified as Zero-Tolerance Cases as defined by the customer. These include, but are not limited to, matters involving the most serious breaches of human rights, ethical, or legal standards as specified in the applicable customer requirements.

In the event of a Zero-Tolerance Case, the following special procedure applies:

- The customer will be notified promptly upon identification of the case as a Zero-Tolerance Case;
- The customer will be actively involved in the handling and processing of the case, including participation in the assessment, investigation steps, and determination of remedial measures;
- Regular updates will be provided to the customer throughout the process;
- No final resolution will be implemented without prior alignment with the customer;
- All communication and documentation relating to Zero-Tolerance Cases will be managed with particular care and in compliance with applicable confidentiality and data protection requirements.

The involvement of the customer in Zero-Tolerance Cases does not limit Hortiful GmbH & Co. KG's responsibility to conduct its own thorough investigation and to implement appropriate remedial actions.

Follow-up Measures

Depending on the outcome of the assessment, the responsible body will determine and implement appropriate follow-up measures in accordance with § 18 of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz). Such measures may include in particular:

- Conducting internal investigations within Hortiful GmbH & Co. KG or the relevant organisational unit, including contacting affected persons and departments;
- Referring the reporting person to other competent internal or external bodies (e.g. regulatory authorities, counselling services, or specialized agencies) where the matter falls outside the scope of this mechanism or where additional support is appropriate;
- Transferring the matter for further investigation to an internal unit responsible for such enquiries (e.g. Legal, Human Resources, or Compliance), or to a competent external authority;
- Closing the procedure due to insufficient evidence or for other substantiated reasons, with the reporting person being informed accordingly;
- Preventive or corrective actions;
- Risk mitigation measures;
- Disciplinary actions;
- Improvements to policies, procedures, or controls;
- Engagement with suppliers or business partners.

The responsible person will document the follow-up measures taken and the reasons for the decisions made, in accordance with applicable record-keeping requirements.

Feedback

The reporting person will receive feedback within three (3) months of the confirmation of receipt of the report. If no confirmation of receipt was provided (e.g. in the case of anonymous reports), feedback will be given no later than three (3) months and seven (7) days after the report was received.

Feedback will include information on planned or already implemented follow-up measures and the reasons for these measures, in accordance with § 17 (2) of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz).

Feedback to the reporting person will only be provided to the extent that it does not prejudice internal enquiries or investigations and does not impair the rights of persons who are the subject of a report or who are named in a report. In particular, no information will be disclosed that could reveal the identity of persons under investigation or compromise ongoing proceedings.

7. Preference for Internal Reporting

Hortiful GmbH & Co. KG attaches great importance to the early internal clarification of potential violations.

Therefore, where appropriate under the circumstances, reporting persons are encouraged to use the Company's internal Grievance Mechanism as their preferred reporting channel. Internal reporting often enables concerns to be investigated more quickly and allows appropriate remedial actions to be implemented without delay.

The right to contact external reporting authorities, regulatory bodies, judicial authorities, or other competent institutions remains unaffected.

8. Documentation and Data Protection

Reports and investigations will be documented in accordance with applicable legal requirements and retained only for as long as necessary.

Personal data will be processed exclusively for the purpose of handling reports and complaints and in compliance with applicable data protection laws.

9. Review of Effectiveness

The effectiveness of this Grievance Mechanism will be reviewed regularly.

Where necessary, the procedure will be updated to reflect legal developments, operational experience, and identified improvement opportunities.

10. Communication and Publication

In order to ensure that the Grievance Mechanism is accessible and known to all relevant stakeholders, Hortiful GmbH & Co. KG takes the following communication measures:

Direct Contractual Partners

All direct contractual partners of Hortiful GmbH & Co. KG will be informed of the existence and availability of this mechanism by means of a written letter. The letter will include the relevant reporting channels and a summary of the purpose and scope of the mechanism.

Suppliers

Suppliers are required to display the poster provided by Hortiful GmbH & Co. KG in a clearly visible location within their premises. The poster contains the key information about the reporting channels and the purpose of the mechanism. Hortiful GmbH & Co. KG will make the poster available to suppliers in the appropriate language versions. Please also use the poster with your affiliated packhouses, growers and direct suppliers to make it available for the employees and workers at farms and beyond.

Compliance with this requirement may be verified as part of Hortiful GmbH & Co. KG's supplier monitoring activities.

Internal Communication

Employees of Hortiful GmbH & Co. KG will be informed of this mechanism and any updates thereto via the company's internal online pinboard. New employees will be made aware of the mechanism as part of their onboarding process.

These communication measures form part of Hortiful GmbH & Co. KG's obligation to make the mechanism known, accessible, and effective, in accordance with applicable legal requirements including the German Whistleblower Protection Act (Hinweisgeberschutzgesetz) and relevant human rights and environmental due diligence legislation.

11. Contact

For questions regarding this procedure, please contact:

Hortiful GmbH & Co. KG
ESG Manager
csr@hortiful.com
+49 6227 3582790 (There is an option to leave a message)
Robert-Bosch-Str. 35,
69190 Walldorf,
Germany