

# RULES OF PROCEDURE FOR THE WHISTLEBLOWING SYSTEM

of Peek&Cloppenburg\* and VAN GRAAF in  
accordance with the German Supply Chain  
Sourcing Obligations Act.

\* There are two independent companies Peek&Cloppenburg with their headquarters in Düsseldorf and Hamburg. This document belongs to the Peek&Cloppenburg KG in Hamburg, whose locations can be found [here](#).

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## A. The Peek&Cloppenburg Hamburg whistle-blower system

For over 100 years, Peek&Cloppenburg Hamburg has stood for quality, because - quality attracts. Therefore, fair, correct and compliant behaviour has top priority for us. In order to live up to our high standards, it is important to recognise, analyse and remedy potential misconduct.

With the whistle-blower system, we offer the possibility to report potential misconduct. We check every report and follow it up consistently. We guarantee the greatest possible protection for whistle-blowers and those affected, you do not have to fear reprisals and your concerns will be treated fairly and anonymously. Our confidential counsellors who process the reports are not bound by instructions and are obliged to maintain strict confidentiality, also towards superiors. A waiver of confidentiality can be agreed with the whistle-blower.

The presumption of innocence applies to those affected until the violation can be proven. Investigations are carried out with absolute confidentiality and are handled in a fair, protected and timely manner.

### I. Subject of the whistle-blower system

Our whistle-blower system enables any person to inform us in accordance with the LkSG:

- Human rights risks
  - Child labour
  - Forced labour and slavery
  - Inadequate occupational safety/occupational health
  - Restrictions on freedom of association
  - Discrimination
  - Withholding a fair wage
  - Damage to life or livelihood
  - Unlawful eviction
  - Deployment of security forces
  - Other violations of human rights

- Environmental risks
  - Use of mercury (according to Minamata Convention)
  - Use of persistent organic pollutants (according to POPs Convention)
  - Shipments of waste (according to the Basel Convention)
  - Other infringements

The Board of Directors is responsible for the management of the company and its subsidiaries.

In addition, all other violations of human rights that are relevant under criminal or civil law can be reported.

## II. Reporting channels

Defined persons of trust are responsible for the whistle-blower system. The confidential counsellors are, as required by law, free from any obligation to provide information and are bound to strict confidentiality when processing the reports.

There is the possibility of reporting in several ways:

- Digital [whistleblowing system](#) (RECOMMENDED)
- By mail to: [compliance@peek-und-cloppenburg.de](mailto:compliance@peek-und-cloppenburg.de)

- By mail to:

<p><b>-Confidential-</b> Peek &amp; Cloppenburg KG Attn: Compliance WB Mönckebergstraße 8 20095 Hamburg Germany</p>
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- In person at the Central Administration:  
Compliance Department (External: Registration at the Reception)

If this is desired, please describe the facts as completely and comprehensively as possible, stating a contact option.

## III. Validity range

The whistleblowing system is a public whistleblowing system and is accessible to every Group employee, business partner and external parties (potentially affected parties) along the entire supply chain.

## IV. Explanations on the whistleblowing system

We investigate every tip-off and follow it up consistently. We guarantee the greatest possible protection against discriminatory or disciplinary measures for whistle-blowers. Their concerns and identity are treated in the strictest confidence. A waiver of confidentiality regarding the identity of the whistle-blower can only be agreed upon after consultation with the whistle-blower.

We do not tolerate reprisals against the whistle-blower. If there is any evidence of reprisals against the whistle-blower, please inform our Compliance Department immediately.

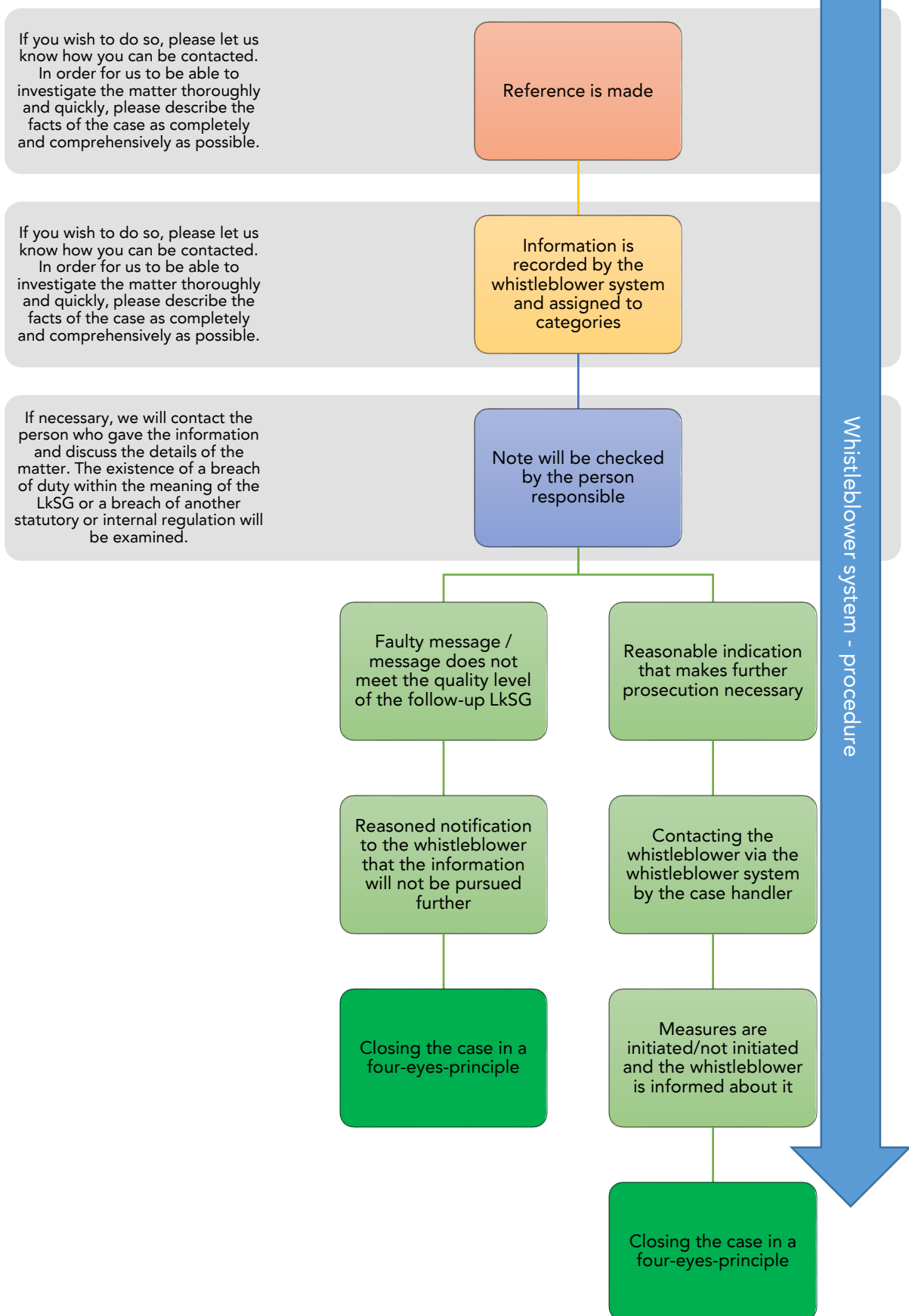
The presumption of innocence applies to those affected until the violation can be proven. Investigations are conducted with absolute confidentiality and are handled in a fair and protected manner. The principle of proportionality is always respected and in each individual case, it is examined which consequences are suitable, necessary and appropriate. The rights to information, rectification and to be heard in the course of the investigation are granted.

## V. Advantages of the digital whistleblowing system

Our digital whistleblowing system offers comprehensive advantages:

- The whistle-blower is guided through the whistleblowing system in a self-explanatory way. In this way, all information necessary for processing the tip can be recorded and forwarded directly to the responsible department.
- The digital whistle-blower system enables communication between the responsible officer and the whistle-blower, even if the report is anonymous. By clicking on the button "Submit a report", the person submitting the report can choose whether he or she wants to submit a report anonymously or by giving his or her name. After successfully submitting the report, the person submitting the report will be shown the access data to their own mailbox within the whistle-blower system. Please make a note of these access data.
- The system has the option of selecting different languages, thus ensuring linguistic accessibility.

## VI. Process flow



## VII. Who can I contact if I have any questions?

In the digital whistle-blower system, under the tab "FAQ", many questions and the corresponding answers related to the whistle-blower system can be found.

Furthermore, queries can be sent to [compliance@peek-und-cloppenburg.de](mailto:compliance@peek-und-cloppenburg.de) at any time.

## B. Confidentiality & Data Protection

Documents, records and messages sent to us by you will, of course, still be encrypted in the digital whistle-blower system and processed in strict confidence and in compliance with data protection laws. You can find our data protection declaration on our [website](#). You can reach our data protection officer at: [datenschutz@peek-und-cloppenburg.de](mailto:datenschutz@peek-und-cloppenburg.de)

We ensure confidentiality to the highest standard, protecting you from reprisals, disadvantages or punishment. Every tip is safe with us.

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