RULES OF PROCEDURE WITH REGARD TO GRIEVANCES

Status: November 2026

1. PREAMBEL

The Tchibo GmbH (hereinafter referred to as Tchibo) has established a grievance procedure that enables individuals and organizations to report human rights and environmental risks, as well as violations arising from the actions of Tchibo or its direct and indirect suppliers.

The goal is to promptly identify issues within the supply chain, to address them through dialogue with involved parties wherever possible, and to develop and implement effective preventive measures.

In addition to the procedure, there are internal regulations, standards, and work instructions that govern the processes as well as the rights and responsibilities of the employees involved in the grievance procedure. These internal regulations are in line with the present procedural guidelines.

2. GENERAL PRINCIPLES

2.1 CONFIDENTIALITY / DATA PROTECTION

When receiving, forwarding and processing information, Tchibo shall protect the identity of the person providing the information and other persons involved in accordance with data protection requirements. The identity will only be disclosed to third parties to the extent that this is absolutely necessary for the investigation and follow-up of the tip-off or if this is required by applicable law in the context of investigations by national authorities or legal proceedings.

2.2 ANONYMOUS TIP-OFFS

Tchibo also investigates anonymous tip-offs. An anonymous reporting option exists in particular via the digital whistleblowing system (BKMS). To ensure that whistleblowers can still be contacted for any queries or feedback, they have the option of remaining in contact with Tchibo by setting up a protected mailbox at the end of the report while retaining anonymity.

2.3 PROTECTION OF THE WHISTLEBLOWER AGAINST REPRISALS

Tchibo shall ensure that whistleblowers do not suffer any reprisals as a result of their report. Business partners are obligated to ensure this as part of the Supplier Code of Conduct.

3. DEFINITIONS

3.1 GRIEVANCES

For the purposes of these Rules of Procedure, a grievance is an indication of a possible or actual violation of the Tchibo Supplier Code of Conduct or of other actual or potential violations of human rights or environmental damage in connection with the actions of Tchibo. The grievance should be fact-based, the grievance raiser should be able to provide sufficient information regarding the risk or violation. There should be a link to Tchibo or the Tchibo supply chain.

3.2 GRIEVANCE RAISER

Any person or organization directly affected or representing the interests of a directly affected person or group, or having direct knowledge of a risk of non-compliance, may submit a grievance to Tchibo that meets the definition set forth in 3.1. In any case, the grievance raiser must have accurate information about the grievance.

It is possible to file an anonymous grievance. In this case, it is especially important to provide sufficient information (see Section 4.3) when filing the grievance to allow for a proper investigation.

3.3 GRIEVANCE OFFICE

The Grievance Office handles all reports of actual or potential violations of human rights and environmental standards at Tchibo, as well as in its supply chain (including indirect and direct suppliers). It consists of employees from the Corporate Responsibility department. The Grievance Office works impartially and the employees are independent with regard to the processing of grievances, not bound by instructions and sworn to secrecy. While ensuring data protection and confidentiality, the Grievance Office may call in experts from within and outside Tchibo for the processing of grievances.

4. PROCEDURE

4.1 GRIEVANCE CHANNELS

Tchibo has established the following channels for reporting grievances:

4.1.1 GRIEVANCE OFFICE

Grievances may be submitted directly to the Grievance Office:

- by e-mail to: socialcompliance@tchibo.de
- by mail to Tchibo GmbH, Corporate Responsibility, Beschwerde-Stelle, Überseering 18, D-22297 Hamburg/Germany.

4.1.2 DIGITAL WHISTLEBLOWING SYSTEM

Grievances can be submitted – also anonymously – via the digital Tchibo whistleblowing system, the Tchibo Integrity Line. It can be reached via this link: https://tchibo.integrityline.app/.

Grievances will be forwarded to the Grievance Office by the Compliance Committee of Tchibo.

4.1.3 WE FACILITATORS OR LOCAL EMPLOYEES OF TCHIBO OR EXTERNAL SERVICE PROVIDERS

Within the framework of the WE program, factory workers get in touch with facilitators from the Tchibo WE program, and local Tchibo employees and employees of service providers of Tchibo also have contact with factory workers or farmers. These groups of people also receive grievances and forward them to the grievance office for processing.

4.1.4 NETWORKS

Tchibo participates in the ACT (Action, Collaboration, Transformation) and International Accord (Agreement for Fire Protection and Building Safety) initiatives. Grievances can also be submitted through these networks.

Grievances related to our coffee origins can also be submitted through the Ear4U process of the German Coffee Association (DKV), in which Tchibo participates. Receipt of the grievance will be acknowledged to the person making the reference via an automatic notification.

Global Risk Assessment Services GmbH (GRAS) acts as the managing organization for the grievance procedure and initially conducts a formal review of each submitted grievance.

If the grievance is deemed admissible, GRAS also carries out a substantive examination. Afterwards, GRAS forwards the grievance, along with any relevant information collected during the substantive review, to the companies involved—specifically to their respective grievance offices—so that appropriate remedial measures can be initiated.

4.1.5 INTERNAL CHANNELS

In addition to the digital whistleblowing system, other internal channels and points of contact are available for grievances from employees, which are communicated e.g. via the Tchibo intranet.

4.2 ACKNOWLEDGEMENT OF RECEIPT

The receipt of the grievance will be confirmed to the grievance raiser within 7 days, provided that contact details were given when the grievance was submitted.

4.3 EXAMINATION OF THE VALIDITY OF THE GRIEVANCE

In a first step, the grievance office checks whether the grievance meets the definition in section 3.1 and is therefore valid. In particular, it is important to determine whether the grievance is related to Tchibo. The grievance raiser will be informed in a timely manner, stating the reasons, if the grievance has not been classified as valid.

4.4 FACTUAL EXAMINATION OF THE GRIEVANCE

The Grievance Office shall examine the grievance. A case-by-case review of the facts is conducted based on the following criteria, among others:

- Seriousness of the potential violation / risk
- Evidence of the incident
- Connection to Tchibo or its supply chain
- Contribution of Tchibo to the cause
- Individual case or systemic grievance
- Possibility of Tchibo to influence remedy and prevention

The facts of the case are discussed with the grievance raiser. If necessary, external assistance, e.g. from local forces or service providers, will be sought. The accused will be asked to make a statement if the grievance raiser has not excluded this.

A detailed description of the case is important for a thorough investigation. Therefore, the following information will be very valuable for the investigation if they are available:

- Exact description of the grievance case:
  - → Time of the incident
  - → Name and position of the person involved (if anonymity was not chosen)
  - → Name and address of the person / organisation accused by the grievance raiser
  - → Description of the violation of the Tchibo Social Code of Conduct, human rights standard or environmental standard
- Reference to Tchibo
- Evidence supporting the grievance
- Contact details of the grievance raiser, if the grievance was not made anonymously and contact is desired.

The grievance raiser is actively involved in the investigation of the facts of the case, where possible.

The Grievance Office will inform the grievance raiser immediately of the outcome of the investigation and give reasons if rejecting the grievance.

The Tchibo shall endeavour to review the case as quickly as possible in a timely manner.

5. PLAN FOR THE ELIMINATION OF GRIEVANCES AND MONITORING

If the factual investigation determines that the grievance is substantiated, Tchibo will make every effort to remedy the situation. The goal of the grievance procedure is to reach an amicable solution with the grievance raiser and the other parties involved.

In doing so, Tchibo distinguishes between

a) violations that Tchibo has directly caused or to whose occurrence Tchibo has significantly contributed
b) and violations that Tchibo neither caused nor significantly contributed to.

Ad a) In the case of directly caused violations, Tchibo will actively seek to remedy the violation. In addition, Tchibo will take measures to prevent the occurrence of such a breach in the future.

Ad b) In the case of violations caused by direct or indirect suppliers or contractual partners of Tchibo, for which Tchibo is not causally responsible or to which Tchibo has not contributed through its actions, Tchibo will use its influence to work towards remedying the violation.

For each measure, Tchibo shall set an internal deadline for implementation that is reasonable in the individual case. After expiration of the deadline, Tchibo will contact the grievance raiser to review the implementation. If necessary, Tchibo reserves the right to take further appropriate measures if the measures have not yet led to success or to reduce the risk of repetition.

Relevant information on grievances, anonymized with regard to the grievance raiser and other persons involved, will be passed on internally to the respective purchasing department or other departments affected by the grievance for future risk assessment and updating of the risk analysis.

6. REVIEW OF THE EFFECTIVENESS OF THE PROCEDURE

The effectiveness of the grievance procedure is reviewed once a year. If the grievances received indicate the need for an occasion-related review, this is carried out promptly.

The procedure is critically scrutinized. It is evaluated whether the case was handled as intended in consultation with the grievance raiser. In addition, it is checked whether the reported grievances could be permanently resolved and whether the relevant information was forwarded to the departments concerned. Information from grievance raisers and other involved parties on how to improve the process is taken into account.

In addition, easy and barrier-free access is regularly checked and, if necessary, continuously improved.

7. REPORTING

Once a year, an evaluation of the grievance cases received is carried out with the most important key figures on grievances, including the number of grievances by topic, channel of access, country of origin, etc.