

Report on the LkSG (Supply Chain Due Diligence Act)

Reporting period from 01.01.2023 to 31.12.2023

Name of the organization: Wolt Logistics Deutschland GmbH

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A. Strategy & anchoring

A1. Monitoring of risk management & responsibility of the management

What responsibilities were defined for monitoring risk management in the reporting period?

The Global Head of Sustainability (Jamieson Saab) is the designated person responsible for environmental and human rights risk management at Wolt in accordance with Section 4 (3) LkSG. He is responsible for monitoring risk management in environmental and human rights issues and informs the management about the results of these activities.

A. Strategy & anchoring

A1. Monitoring of risk management & responsibility of the management

Has the management established a reporting process that ensures that it is regularly - at least once a year - informed about the work of the person responsible for monitoring risk management?

It is confirmed that the management has established a reporting process that ensures that it is informed regularly - at least once a year - about the work of the person responsible for monitoring risk management within the meaning of Section 4 (3) LkSG.

- Confirmed

Describe the process that ensures reporting to management at least once a year or regularly with regard to risk management.

At least once a year, the sustainability team conducts a review of the relevant environmental and human rights risks both for the business activities of Wolt Logistics Deutschland GmbH and for the activities in the supply chain and prepares a written report, which is presented to the Executive Board at least once a year in a separate Executive Board meeting. At the management meeting, the report is discussed with the Global Head of Sustainability with the aim of discussing recommendations and remedial measures. Ad hoc risks are reviewed by the internal Compliance Committee when they arise and presented to the Executive Board without delay.

This process and the responsibilities are defined in internal guidelines of Wolt Logistics Deutschland GmbH.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Is there a policy statement that has been prepared or updated on the basis of the risk analysis carried out during the reporting period?

The policy statement has been uploaded <https://explore.wolt.com/en/deu/speakup>

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Has the policy statement for the reporting period been communicated?

It is confirmed that the policy statement has been communicated to employees, the works council if applicable, the public and the direct suppliers where a risk was identified in the risk analysis.

- Not confirmed

If none or not all target groups were communicated to, please give reasons for your answer.

The year 2023 represents the first reporting period for Wolt Logistics Deutschland GmbH, meaning that the policy statement could only be finalized at the beginning of 2024 on the basis of the risk assessments previously carried out. The policy statement is now available on our website and via various internal communication channels. With regard to our suppliers, the policy statement is included in our Code of Conduct, partner guidelines and individual contracts.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

What elements does the policy statement contain?

- Establishment of a risk management system
- Annual risk analysis
- Establishment of preventive measures in the company's own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Corrective measures in own business area, at direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Provision of a complaints procedure in the company's own business area, with suppliers and review of its effectiveness
- Documentation and reporting obligations
- Description of the priority risks identified
- Description of human rights-related and environmental expectations of own employees and suppliers

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Description of possible updates during the reporting period and the reasons for them.

The policy statement was first prepared in 2023. It has therefore not yet been updated.

A. Strategy & Anchoring

A3. Anchoring the human rights strategy within your own organization

In which relevant departments/business processes was the anchoring of the human rights strategy ensured during the reporting period?

- Personnel/HR
- Location development/management
- Environmental management
- Occupational safety & occupational health management
- Communication / Corporate Affairs
- Purchasing/Procurement
- Supplier management
- CSR/Sustainability
- Legal/Compliance
- Quality management
- Other: Global Risk Team / Global Risk Team

Describe how responsibility for implementing the strategy is distributed within the various specialist departments/business processes.

Responsibility for dealing with EHR risks lies with the following main functions:

The CFO and the Internal Audit Committee are responsible for

- Review all EHR risks and decide on appropriate measures
- Allocation of internal resources or assignment of responsibilities to relevant internal stakeholders as required

The Global Head of Sustainability is responsible for:

- the development of the global EHR risk framework (policy statement), including the regular updating and maintenance of the internal methodology for calculating EHR risks from operations and our supply chain
- Supporting the Global Risk Team in conducting regular EHR risk assessments of selected country activities
- Advising the CFO and the Internal Audit Committee on relevant measures to address identified EHR risks or issues
- Supporting the various risk owners or business units in understanding and/or training, communicating and educating their own stakeholders about our EHR obligations

- Preparation of an annual report on EHR risks at Wolt (in coordination with various departments)

The Global Procurement and Quality teams are responsible for:

- the integration of Wolt's EHR obligations into our global procurement processes
- Communicating our EHR expectations to suppliers, e.g. through our Code of Conduct
- Identification and labeling of relevant EHR risks from individual suppliers as part of the onboarding process for the Internal Audit Committee
- Determination of relevant contractual remedies to mitigate potential EHR risks identified during the onboarding process with individual suppliers
- Advising the CFO and the Internal Audit Committee on relevant actions to address identified EHR risks or issues
- Auditing or investigation of potential risks at selected suppliers
- Ensure that suppliers develop and implement corrective action plans when requested to do so

The Global Risk Team is responsible for

- Ensure that EHR risks are aligned with and integrated into Wolt's enterprise risk management system
- Carrying out annual EHR risk assessments of selected country activities at the request of the Internal Audit Committee
- Advising the CFO and the Internal Audit Committee on relevant actions to address identified EHR risks or issues
- Tracking of relevant EHR risks, risk owners, controls and progress in the Wolt risk register

The Legal Compliance Team is responsible for

- the development and maintenance of our complaints mechanism for third parties ("Speak Up channel")
- Review and investigation of all cases within a reasonable timeframe
- Advising the CFO and the Internal Audit Committee on relevant measures to address identified EHR risks or issues
- Management and implementation of the legally required ad hoc reporting to supervisory authorities

The risk owners are responsible for

- Development and implementation of relevant controls, also at the request of the CFO or the Internal Audit Committee

Describe how the strategy is integrated into operational processes and procedures.

See 1.1

Describe which resources & expertise are provided for implementation.

See 1.1

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Was a regular (annual) risk analysis carried out during the reporting period to identify, weight and prioritize human rights and environmental risks?

- Yes, for your own business area
- Yes, for direct suppliers

Describe the period in which the annual risk analysis was carried out.

The risk assessment for Wolt Logistics Deutschland GmbH was completed between September 2023 and March 2024, while the supply chain risk assessment was completed in March 2024.

Describe the risk analysis procedure.

1) The Sustainability and Global Risk team created a risk register based on the Supply Chain Due Diligence Act and used this to create a risk analysis of our business activities to also understand what remaining EHR risks we have. We review the effectiveness of our defined controls for already known risks. This was primarily done through the use of a dedicated questionnaire with key business owners and was supplemented by a review of complaints received through the Speak Up channel.

2) Supply Chain Review - The Sustainability team developed a catalog of potential EHR risks and risk scores by spend category using a variety of external trusted sources identified through several months of research. This risk assessment was then applied to all spend in 2023, resulting in a risk score for individual suppliers. This was supplemented by a review of complaints received through the Speak Up channel that are relevant to our supply chain.

The results of both the operational risk assessment and the supply chain review were summarized in a formal report that was presented to the CFO, the internal audit committee and the local management team. These were also recorded in our formal company-wide risk register.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were event-driven risk analyses also carried out during the reporting period?

- NOTE: The right to refuse to testify was exercised for this question.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) in your own business area?

- Prohibition of hiring or using private/public security forces that could lead to impairments due to lack of instruction or control
- Disregard for occupational health and safety and work-related health hazards
- Destruction of the natural basis of life through environmental pollution
- Disregard for freedom of association - freedom of association & right to collective bargaining
- Unlawful violation of land rights
- Prohibition of forced labor and all forms of slavery
- Prohibition of unequal treatment in employment
- Ban on child labor
- Prohibition of withholding an appropriate wage
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention
- Prohibited production, use and/or disposal of mercury (Minamata Convention)

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for direct suppliers?

- Prohibition of hiring or using private/public security forces that could lead to impairments due to lack of instruction or control
- Disregard for occupational health and safety and work-related health hazards
- Destruction of the natural basis of life through environmental pollution
- Disregard for freedom of association - freedom of association & right to collective bargaining
- Unlawful violation of land rights
- Prohibition of forced labor and all forms of slavery
- Prohibition of unequal treatment in employment
- Ban on child labor
- Prohibition of withholding an appropriate wage
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention
- Prohibited production, use and/or disposal of mercury (Minamata Convention)

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were the risks identified in the reporting period weighted and, if applicable, prioritized and, if so, on the basis of which appropriateness criteria?

- Yes, based on the expected severity of the injury in terms of degree, number of people affected and irreversibility
- Yes, on the basis of your own influence
- Yes, based on the probability of occurrence
- Yes, based on the nature and scope of the company's own business activities
- Yes, based on the type of causal contribution

Describe in more detail how the weighting and prioritization process was carried out and what considerations were made.

For our own business activities, risk assessments were mainly carried out through a series of workshops with relevant managers.

Risks were identified by internal risk owners or subject matter experts, who were then asked to rate each risk based on several variables (see below). This is referred to as an inherent risk score.

Valuation variables:

- the nature of the risk
- Our contribution to risk
- the reversibility of the risk
- the number of people affected or the impact of the risk on nature/ecosystems
- our ability to influence the risk result
- the probability that the risk will occur

In consultation with the same internal managers, target risk scores were defined for the same variables. This is referred to as the target risk score.

Relevant controls and mitigations were then identified and assigned to each issue to bring the inherent risk score closer to the target risk score. The final result is referred to as our residual risk score, which is then used as the actual risk exposure for that risk. The controls were then tracked and monitored in our risk management system.

To determine our supply chain risks, Wolt identified all possible categories of procurement spend and conducted external research on all potential EHR risks prevalent in those categories. Each individual potential risk for each category was then assessed using the same variables mentioned above.

B. Risk analysis and preventive measures

B2. Prevention measures in own business area

Which risks were prioritized in your own business area during the reporting period?

- NOTE: The right to refuse to testify was exercised for this question.

B. Risk analysis and preventive measures

B2. Prevention measures in own business area

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks in your own business area?

- NOTE: The right to refuse to testify was exercised for this question.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

Which risks were prioritized for direct suppliers during the reporting period?

- NOTE: The right to refuse to testify was exercised for this question.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks at direct suppliers?

- NOTE: The right to refuse to testify was exercised for this question.

B. Risk analysis and preventive measures

B5. Communication of the results

Were the results of the risk analysis(es) for the reporting period communicated internally to relevant decision-makers?

It is confirmed that the results of the risk analysis(es) for the reporting period were communicated internally to the relevant decision-makers, such as the Executive Board, the management or the purchasing department, in accordance with Section 5 (3) LkSG.

- Confirmed

B. Risk analysis and preventive measures

B6. Changes in risk disposition

What changes have occurred with regard to priority risks compared to the previous reporting period?

This is the first reporting period.

C. Identification of violations and corrective measures

C1. Identification of violations and corrective measures in own business area

Were any violations identified in your own business area during the reporting period?

- Yes, only in Germany

Please specify: In which topics were violations identified in your own business area?

- Disregard for occupational health and safety and work-related health hazards

Enter the number of

3

Describe the appropriate remedial action you have taken.

- NOTE: The right to refuse to testify was exercised for this question.

In cases where injuries could not be stopped, describe where they occurred.

- NOTE: The right to refuse to testify was exercised for this question.

Describe what long-term remedial measures (e.g. follow-up concepts) have been taken and what considerations have been made with regard to the selection and design of the measures for termination or further minimization.

- NOTE: The right to refuse to testify was exercised for this question.

Describe how the effectiveness of the corrective measures is verified.

- NOTE: The right to refuse to testify was exercised for this question.

Have the remedial measures led to the cessation of the injury?

- Partial

Explain.

In 2023, we took several measures to analyze and, if necessary, rectify the suspicious activity reports communicated through the Speak Up channel. This included the development and provision of relevant training content for all affected parties.

In view of current developments, we consider the measures taken to be positive.

Have you analyzed to what extent the identified violation is an indication of a possible need to adapt/add to existing prevention measures? Please describe the process, results and impact of your analysis.

See 1.6.1.

C. Identification of violations and remedial measures

C2. Identification of violations and corrective actions at direct suppliers

Were any violations identified at direct suppliers during the reporting period?

- Yes

Describe the basis on which the identified violations were weighted and prioritized and what considerations were made.

See answers in section B.1.

In which areas were violations identified at direct suppliers?

- Prohibition of withholding an appropriate wage

Enter the number of

2

Describe the appropriate remedial action you have taken.

- NOTE: The right to refuse to testify was exercised for this question.

Describe what considerations were made with regard to the selection and design of the measures as part of the corresponding follow-up concepts for termination and minimization

- NOTE: The right to refuse to testify was exercised for this question.

Describe how the effectiveness of the corrective measures is verified.

- NOTE: The right to refuse to testify was exercised for this question.

Have the remedial measures led to the cessation of the injury?

- Yes

Explain.

In 2023, two suspected violations at direct suppliers were reported via our speak-up channel. Both cases were forwarded to the responsible internal departments and investigated. In one case, it turned out to be a false report, and in the second case, the matter was immediately investigated by

The situation has been rectified by the suppliers concerned. In view of current developments, we consider the measures taken to be positive.

Have you analyzed to what extent the identified violation is an indication of a possible adjustment/addition to existing prevention measures? Describe the process, results and impact.

Yes, as a result of these cases, we identified a need to optimize our internal processes and introduced clear protocols and remedial measures to prevent potential violations in the future. In 2024, we introduced a new procurement system that recognizes the potential for such problems at the supplier intake stage. Furthermore, an additional unit was created to regularly ensure supplier compliance.

C. Identification of injuries and remedial measures

C3. Identification of violations and corrective actions for indirect suppliers

Were any violations identified at indirect suppliers during the reporting period?

- No

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

- In-house complaints procedure
- Combination of internal and external processes

Describe the company's own process and/or the process in which your company participates.

In 2023, Wolt has extended the whistleblower channel provided by an independent third party provider ("Speak-Up Channel"), which can be used by all parts of the organization, including third parties such as our suppliers, courier partners and handlers. The third party provider is bound by strict confidentiality requirements that make it impossible for Wolt to discover IP addresses or other identifying information related to reports submitted to them unless provided by the complainant.

As soon as complaints are received via the speak-up channel, they are translated into English if necessary and then forwarded to the Legal Compliance team for processing. The Legal Department evaluates each report received and aims to contact the reporter within seven calendar days, prepare an investigation report and determine the severity of the report.

Depending on how much information can be obtained from this initial follow-up, the report will be shared internally with the relevant decision maker(s) for input on next steps, which may include a formal investigation, interviews and/or the collection of data to substantiate the case. A final report will then be prepared for decision making with the relevant decision maker(s). The final outcome of the case will then be reported to senior management on at least a quarterly basis.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Which potentially involved parties have access to the complaints procedure?

- Own employees
- Communities in the vicinity of own locations
- Employees at suppliers
- External stakeholders such as NGOs, trade unions, etc

How is access to the complaints procedure ensured for the various groups of potentially involved parties?

- Publicly accessible rules of procedure in text form
- Information on accessibility
- Information on responsibility
- Information on the process
- All information is clear and understandable
- All information is publicly accessible

Publicly accessible rules of procedure in text form Optional:

Describe.

For more information on Wolt's Speak Up channel, please visit the following website:
<https://explore.wolt.com/en/deu/speakup>

Information on accessibility Optional:

Describe.

For more information on Wolt's Speak Up channel, please visit the following website:
<https://explore.wolt.com/en/deu/speakup>

Information on responsibility Optional:

Describe.

For more information on Wolt's Speak Up channel, please visit the following website:
<https://explore.wolt.com/en/deu/speakup>

Information on the process

Optional: Describe.

For more information on Wolt's Speak Up channel, please visit the following website:

<https://explore.wolt.com/en/deu/speakup>

All information is clear and understandable Optional:

Describe.

For more information on Wolt's Speak Up channel, please visit the following website:

<https://explore.wolt.com/en/deu/speakup>

All information is publicly available Optional: Describe.

For more information on Wolt's Speak Up channel, please visit the following website:

<https://explore.wolt.com/en/deu/speakup>

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Were the rules of procedure for the reporting period publicly available?

For more information on Wolt's Speak Up channel, please visit the following website:
<https://explore.wolt.com/en/deu/speakup>

D. Complaints procedure

D2. Requirements for the complaints procedure

Indicate the person(s) responsible for the procedure and their function(s).

The Legal Compliance team is based in Finland and is led by the Director of Legal Compliance, Jani Salovaara, who has ultimate responsibility for all SARs received through the speak-up channel. She is accountable to Wolt's Global General Counsel.

Suspicious activity reports received via the speak-up channel that relate to EHR risks are also forwarded to the CFO and the Internal Audit Committee.

It is confirmed that the criteria contained in Section 8 (3) LkSG are met for the responsible parties, i.e. that they offer the guarantee of impartial action, are independent and not bound by instructions and are obliged to maintain confidentiality

- Confirmed

D. Complaints procedure

D2. Requirements for the complaints procedure

It is confirmed that precautions were taken during the reporting period to protect those potentially involved from being disadvantaged or penalized as a result of a complaint.

- Confirmed

Describe what precautions have been taken, in particular how the complaints procedure ensures the confidentiality of the identity of whistleblowers.

Several precautions have been taken to protect the confidentiality of whistleblowers:

- 1) Inability to trace IP addresses - Wolt is unable to trace messages to specific IP addresses due to the use of a third-party tool.
- 2) Option to submit an anonymous report - The Speak Up Channel does not require whistleblowers to provide their contact information when submitting a SAR.
- 3) Availability of different languages - SARs can be submitted in a variety of languages.

Describe what precautions have been taken, in particular what other measures are in place to protect whistleblowers.

Anyone can report possible issues and violations through our Speak Up channel. In addition to the areas that fall within the scope of national whistleblowing legislation, any other suspicion that is suspected of violating laws or Wolt's values and policies can be reported.

D. Complaints procedure

D3. Implementation of the complaints procedure

Did you receive any information about the complaints procedure during the reporting period?

- Yes

Provide details on the number, content, duration and outcome of the procedures.

See answers in sections C.1 and C.2

On which topics have complaints been received?

- Disregard for occupational health and safety and work-related health hazards
- Prohibition of withholding an appropriate wage

Describe what conclusions were drawn from the complaints/reports received and to what extent these findings have led to adjustments in risk management.

See answers in sections C.1 and C.2

E. Review of risk management

Is there a process in place to review the appropriateness and effectiveness of risk management across the board?

In which of the following areas of risk management is the appropriateness and effectiveness checked?

- Resources & Expertise
- Risk analysis and prioritization process
- Preventive measures
- Remedial measures
- Complaints procedure
- Documentation

Describe how this audit is carried out for the respective area and what results it has led to, particularly with regard to the prioritized risks.

The Global Risk Team conducts regular reviews with all risk owners at Wolt (including Wolt subsidiaries) on at least a quarterly basis. This process serves to ensure that the controls are appropriate and guarantees the ongoing support of the risk owners by the management. These measures are recorded in our corporate risk register, which is also submitted to the Internal Audit Committee.

E. Review of risk management

Are there processes or measures in place to ensure that the interests of your employees, the employees within your supply chains and those who may otherwise be directly affected in a protected legal position by the economic activities of your company or by the economic activities of a company in your supply chains are adequately taken into account when establishing and implementing risk management?

In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?

- Resources & Expertise
- Preventive measures
- Remedial measures
- Complaints procedure

Describe the processes and measures for the respective area of risk management.

Wolt ensures that relevant processes and responsibilities for environmental and human rights risks are embedded in every aspect of our business activities so that potential risks can be identified, assessed and remedied in a timely manner.

These processes can be illustrated using the following examples:

- Our Speak Up channel allows us to gather feedback on how effective our established processes are and where potential risks could arise.
- We actively communicate our requirements to both our employees and our suppliers via our codes of conduct, in our contracts and through other channels.
- Establishment of internal committees for regular monitoring.