

HELLOFRESH GROUP

WHISTLEBLOWER POLICY

(Rules of procedure for the complaint procedure of the HelloFresh Group)

At the HelloFresh Group, we believe that sustainable success can only be achieved through sustainable action. On this journey, we are guided by our three ethical core values: Respect, Responsibility and Integrity. We understand compliance with applicable laws and our ethical standards set out in our [Code of Ethics](#) and [Ethical Trading Policy](#) ("Ethical Standards") as an inseparable part of our corporate culture.

An effective whistleblowing system is an essential requirement for upholding our ethical core values in our business activities. It enables us to identify and respond to possible misconduct swiftly and prevent violations going forward. Any report of concerns regarding possible violations of applicable laws or our Ethical Standards as well as risks for human and environmental rights, is therefore very valuable to us. This Whistleblower Policy ("Policy") describes the whistleblowing system of the HelloFresh Group.

Who can submit a report?

The HelloFresh Group offers everyone inside and outside our organization the possibility to report concerns. Anyone can be a whistleblower, regardless whether they are an employee of the HelloFresh Group or of one of our direct or indirect suppliers or a third party. If you are an HelloFresh Group employee and have noticed a potential violation, we ask you to report the incident immediately. We encourage anyone who suspects risks or potential violations to make use of our whistleblower system.

Why should I report concerns?

Only when we learn about violations and risks in our own operations and supply chains are we able to live up to our commitment to a responsible and sustainable corporate governance. Your reports enable us to prevent imminent violations or, if a violation has already occurred, investigate and respond appropriately. Every report is valuable to us as it helps us to prevent risks and damage to our company, our employees, our business partners and our community.

What can I report?

Our whistleblower system can be used to report suspected violations and risks that affect our employees, our direct and indirect suppliers in our supply chains, or other business partners, such as violations of:

- applicable laws and regulations;
- our Code of Ethics;
- our Ethical Trading Policy, in particular, violations or risks relating to the human and environmental rights mentioned therein.

Concerns can refer to, for example, indications of violations of competition and anti-corruption laws, environmental laws, workplace and food safety regulations, or harassment or discrimination against certain people or groups of people. Of particular importance to us are also concerns of any imminent or possibly occurred violations of human rights or employee rights in our own operations and our supply chains.

We ask for your understanding that we cannot handle and process customer concerns or product inquiries via our whistleblower system that do not relate to a violation or risks as described above. For these queries, please contact our customer service.

How can I submit a report?

We offer different channels to report possible violations or risks to our Ethics & Compliance Team.

You can contact our Ethics & Compliance team directly by email or mail:

Email: compliance@hellofresh.com

Postal address: HelloFresh SE
Legal Department
Prinzenstrasse 89
10969 Berlin

In addition, you can also use the [HelloFresh | Speak Up! Platform](https://hellofresh.whistleblownetwork.net/frontpage) (<https://hellofresh.whistleblownetwork.net/frontpage>), an online tool which is accessible via smartphone and computer. The platform is available 24/7, 365 days a year. You can submit your report in any language.



Instead of a text message, you can also record an audio message. In this case, your voice will be made unrecognizable during the recording in order to prevent possible conclusions about your identity. You also have the option of attaching files and images to your report.

The HelloFresh | Speak up! platform also allows you to report anonymously if you prefer. If

you wish to remain anonymous, we encourage you to create a "secure mailbox" when submitting your report. This allows further, anonymous communication with our Ethics & Compliance team. This way, you can provide us with additional information that we may need to follow up on your concern and close the case.

As an HelloFresh Group employee, you can of course also contact your Line Manager or your local Compliance Officer directly outside of the whistleblowing system described in this Policy. They will take the appropriate further steps. Upon request, your Line Manager or [local Compliance Officer](#) will also be available for a personal meeting.

What do I need to consider when reporting concerns?

To process your concern effectively, it is important that your report is as comprehensible and precise as possible. Please describe all relevant information regarding the possible violation or risk (Who? What? When? How often? Where?). Please also provide relevant evidence (photos, documents, videos) if available.

Who receives my report?

The information submitted via the Speak up! Platform, email or mail is only received by a small group of specially trained and authorized employees of the HelloFresh Group's Ethics & Compliance Team.

The members of our Ethics & Compliance Team work impartially and independently. They are not bound by instructions in their work for the whistleblower system. Your report and any other information provided by you will be treated confidentially and disclosed only to the extent necessary to conduct a full and fair investigation or as required by applicable law. Due to the nature of the violation, it may be necessary e.g. to refer your report internally to an investigation task force of subject matter experts, or to involve these experts in the further processing of your report (e.g. Human Resources, Occupational Safety and Food Safety etc.).

All information is stored and processed in accordance with applicable laws.

How will my report be handled?

If you have chosen to provide your contact details or set up a secure mailbox, you will receive a confirmation of receipt of your report within seven days at the latest. The processing time of each report depends on the scope and complexity of the report and can take a few days or several months.

We take every report very seriously. The investigation follows an internally standardized process. First, our Ethics & Compliance Team conducts an initial assessment of the plausibility of the report and evaluates whether there is sufficient grounds for the suspicion of a violation or risk. If further information is needed, the team will contact you with follow-up questions, if you have allowed further exchange.

Investigative actions may include e.g. reviewing documents and conducting interviews with relevant persons. The involvement of third parties, for example in the context of audits, may also be considered. Fairness in dealing with whistleblowers and those affected by the report is very important to us. Those accused of a violation are given the opportunity to be heard. If required by the nature of the suspicion, immediate measures are taken to protect the rights of third parties.

If there is a reasonable basis for a violation of or risks for human and/or environmental rights, further investigative and remedial actions will follow. Depending on the nature and location of the violation or risk, these actions are undertaken by a task force consisting of various subject matter experts, who also support the implementation of follow-up measures. Investigative or remedial actions may also include on-site audits by third parties.

What can be the result of an investigation?

If the suspicions are substantiated, we will initiate appropriate follow-up actions depending on the identified violation or risk.

- We will assess which actions are appropriate regarding the individual violation or risk, depending on the type and severity of the violation/risk, the impact and probability of the violation, the degree of negligence, and the influence which we have.
- If the violation was caused by HelloFresh Group employees, personnel measures will be considered which, depending on applicable local laws, may include disciplinary measures such as a warning or dismissal.
- If a violation or risk has been identified at one of our direct or indirect suppliers or other business partners, our measures may range from the development and implementation of corrective action plans to remedy the violation/risk to the suspension or termination of the business relationship with the respective supplier.
- Based on the received reports we also regularly review the effectiveness of our internal processes and revise them if necessary.

How will I be involved in the process?

We are committed to providing the highest possible transparency to whistleblowers. If you choose to provide your contact information or set up a secure mailbox, our Ethics & Compliance Team will contact you.

- First, you will receive a confirmation of the receipt of your report within seven days. If necessary, the Ethics & Compliance Team will also contact you immediately with further questions regarding the details of your concern. However, please keep in mind that any additional information will help us to follow up on your report more efficiently.
- After three months at the latest, you will receive our feedback on the actions taken so far and the status of our processing of your report.
- Should we, after careful review of your report, have concluded that there is insufficient evidence to substantiate the suspicion of a violation or risk, the Ethics & Compliance Team will inform you of this as well.
- If an investigation is initiated based on your report, you will be informed of the status of the investigation at reasonable intervals. You will in any case be informed of the outcome of the

investigation.

In addition, you can contact the HelloFresh Ethics & Compliance Team at any time, either via compliance@hellofresh.com or via the secure mailbox as applicable.

Can my report have adverse consequences for me?

We are committed to providing the greatest possible protection to whistleblowers and affected individuals. The HelloFresh Group does not tolerate any discrimination against someone who provides information in good faith, regardless of whether the suspicion is confirmed or not. If you are an employee at the HelloFresh Group, this means in particular that a report made in good faith must not have any negative consequences for your employment. Even the attempt to hinder reports or to impair the subsequent communication between a whistleblower and the Ethics & Compliance team or other stakeholders responsible for the investigation is prohibited.