

## **RULES OF PROCEDURE**

**FOR THE JUNGHEINRICH GROUP  
COMPLAINTS PROCEDURE**



# Index

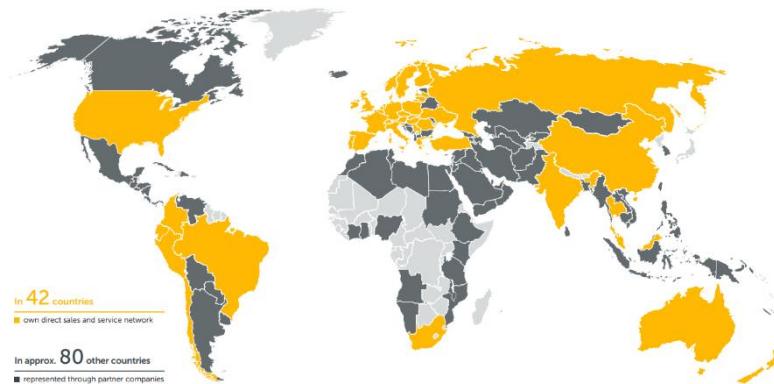
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## 1. Foreword

Jungheinrich does business in many countries around the world with over 20,000 employees. We are aware of the responsibility that comes with this and want to contribute to the sense of "Creating sustainable value."

For us, this includes complying with legal requirements in the countries in which we operate and adhering to internal Jungheinrich rules that apply to the Group.

This also includes respect for human rights regarding our own employees and in our supply chains, as well as respect for the environment in the context of our business activities throughout the Group.



We therefore consider whistleblowers and their reports<sup>1</sup> to be valuable, as they help us to uncover violations of applicable rules and abuses against people and the environment in our own business area or in our supply chains as early as possible. Based on this, we want to take remedial action and initiate preventive measures.

This description of our complaints procedure, which is publicly available, describes the legal bases applied, contact persons, reporting channels offered, the process for handling complaints and the principles that guide us in handling complaints.



**And so, we would like to encourage all whistleblowers to use the Jungheinrich complaints procedure described here!**

<sup>1</sup> We use the terms "information" and "report" synonymously in these Rules of Procedure.



## 2. Legal bases

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### Voluntary commitment of a global corporation

As an international corporation, Jungheinrich is committed to going beyond the minimum legal requirements. We recognize that the implementation of EU directives—in particular the Whistleblower Directive and the EU Supply Chain Directive—varies from one member state to another. Outside the EU, too, some countries have less stringent or no comparable legal requirements.

### Therefore, the following applies across our Group:

- We adhere to the **strictest applicable standards** throughout the Group, especially the German laws **HinSchG** and **LkSG**, regardless of the location of the respective Group entity.
- Our **reporting channels** and **protection mechanisms** are available to all employees worldwide in the same way, irrespective of local legal requirements.
- We ensure that **all whistleblowers** – even in countries with weaker legal protection – receive the same level of protection against reprisals and the same confidentiality as in Germany.
- Our **internal procedures** are designed to meet both the requirements of the **EU directives** and the **UN Guiding Principles on Business and Human Rights**.
- In countries where **local legal requirements are stricter** than our Group standards, we also comply with those enhanced obligations and adapt our processes accordingly.
- In addition to applying Group-wide standards, we also comply with **country-specific regulatory requirements**. This includes, for example, notifying relevant national authorities or supervisory bodies when required by local law.

This commitment is an expression of our understanding of responsible, human rights-compliant, and sustainable business practices—worldwide and uniformly.

We guarantee appropriate protection for anyone who submits reports via the confidential Jungheinrich OpenLine or directly by telephone or email to our Group Reporting Office. This protection covers the following circumstances.

## **1. Protection when reporting the following legal violations in accordance with the Whistleblower Protection Act (HinSchG):**

- Criminal offenses, in particular corruption, competition violations, fraud, embezzlement, data misuse.
- Environmental and occupational safety offenses.
- Attempted and preparatory criminal offenses.
- Administrative offenses for the protection of life, health, or employee rights.
- Labor law violations, e.g., against the AGG (German General Equal Treatment Act), (sexual harassment, bullying).

## **2. Protection when reporting human rights and environmental risks/violations in accordance with the Supply Chain Due Diligence Act (LkSG):**

- Prohibition of child labour forced labour, slavery.
- Discrimination, harassment, restriction of freedom of association.
- Violations of occupational health and safety, working hours, wage payment.
- Environmental pollution, forced evictions, abuse of security services.
- Improper disposal of hazardous waste, use of prohibited substances (e.g., mercury, persistent organic pollutants (POPs)).

## **3. EU Regulation 2023/1542 on batteries (Art. 49)**

In addition, our whistleblower procedure is based on the United Nations Guiding Principles on Business and Human Rights in accordance with Article 49 of Regulation (EU) 2023/1542 on batteries. It includes an early warning system for risk identification and a remediation process to ensure responsible business conduct throughout our operations and supply chain.

## **4. Internal regulations of Jungheinrich AG**

In addition, the reporting channels are also open for reporting irregularities in connection with compliance with Jungheinrich's internal regulations.



### 3. Group Reporting Office at Jungheinrich

The person responsible for organising the existing reporting channels and managing the clarification of all incoming reports at Group level is the Head of Compliance at Group headquarters in Hamburg.

He is hereinafter referred to as the **Head of the Group Reporting Office** and supported in his area of responsibility by qualified employees who report to him directly.

For information on how to contact the Head of the Group Reporting Office or his team, please refer to [Chap. 6.1 Which reporting channels do we offer?](#).

Andre Jacubczik  
Head of Compliance  
Friedrich-Ebert-Damm 129  
22047 Hamburg

Please address requests regarding the use of personal data or the deletion of personal data directly to the **Group Data Protection Officer at Jungheinrich**, as these are not information within the meaning of these Rules of Procedure.

In addition to simple requests for information and deletion, it is also possible to contact the Group Data Protection Officer directly with information or complaints with the threat of consequences under data protection law (e.g., reporting to a data protection supervisory authority).

For contact details as well as further information on the subject of data protection and our privacy policy via see this link here: [Jungheinrich Privacy Policy at jungheinrich.com](#).

## 4. Who can use the Jungheinrich reporting channels?



Compliance reports can be submitted by all Group employees, but also by any external third party, such as our customers, shareholders, employees of suppliers and other business partners as well as job applicants.

The reporting procedure is designed to identify serious risks and breaches that may affect human rights, the environment or legal obligations. Therefore, anyone, even those who are not directly affected, has the possibility of submitting information through this channel.

If the report is made on behalf of another person directly affected, formal authorization may be requested by that person to ensure that their consent is acted upon.

It is important to note that this procedure should not be used to report situations that belong exclusively to the private or personal sphere of the employees, nor to report minor inconveniences without legal relevance, such as changes in the dining room menu, temporary breakdowns of equipment such as a coffee machine or trivial situations between colleagues.

## 5. Who processes incoming reports?



Upon receipt of the report, the Head of the Group Reporting Office evaluates the details of the case and decides on the further clarification of the report.

Depending on the content of the report, further processing is then carried out by qualified **employees of the Group Reporting Office**, by carefully selected internal contacts at Jungheinrich such as the **Human Rights Officer** at Jungheinrich, **employees of the Group Internal Audit department**, by **local Compliance Coordinators**, the **Group Data Protection Officer** at Jungheinrich or, in individual cases, with the involvement of third parties such as law firms.

If the Group Reporting Office receives information relating to a Jungheinrich organisational unit abroad, the following must first be assessed in the Group Reporting Office:

- Legal Obligation: Is the entity obliged under local law to conduct the investigation itself?
- Legal Viability: Is the internal investigation permitted by the local legislation?
- Conflict of Interest: Could there be conflicts of interest?

During this assessment, local data protection regulations and labor legislation must be complied with. In addition, Jungheinrich's internal guidelines must be followed to ensure uniform and transparent handling of information. Likewise, if applicable, the participation of the local works council should be considered.

The designated local compliance coordinators are the first point of contact who will ensure the accordance with locally applicable requirements and Jungheinrich's requirements for report processing. The investigation itself will then be conducted by the Group's Reporting Office.



## 6. Which reporting channels do we offer?

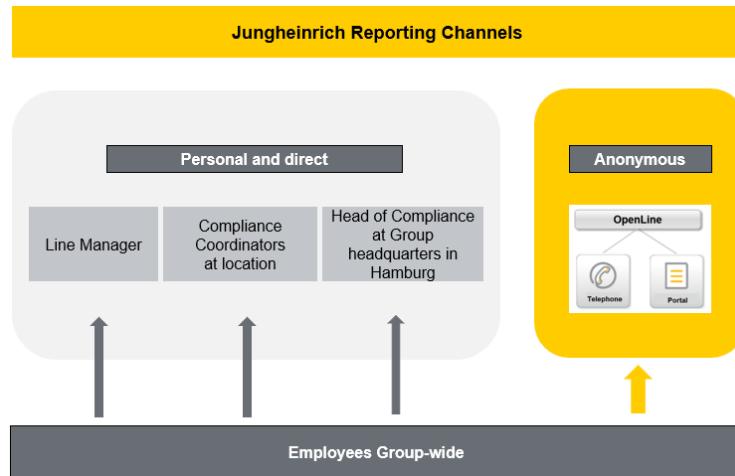
Whistleblowers can contact the Group Reporting Office directly or - if desired - anonymously via the Jungheinrich OpenLine (portal + telephone).

### 6.1 Direct personal contact

#### ***Jungheinrich employees***

Employees are encouraged to contact their direct manager in the event of any doubts or indications. However, if they prefer otherwise, they have the following options:

- Local Compliance Coordinators: at each Jungheinrich location, they are available to receive information confidentially.
- Group Reporting Office: If employees feel it is necessary, they can contact the head of the group Reporting Office or his team internally.



### ***External whistleblowers***

External third parties can contact the Group Reporting Office and request a personal meeting via the following e-mail address.

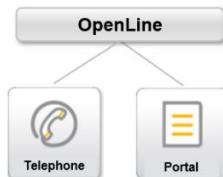
Only the head of the Group Reporting Office and his direct employees have access to this e-mail address, thus guaranteeing the confidentiality of the information received.

**JH-Compliance@jungheinrich.de**

### **6.2 Anonymous Jungheinrich OpenLine Telephone + Portal**

If employees or external third parties prefer a completely anonymous reporting channel, the Jungheinrich OpenLine is available to them.

Contact can be made either by telephone or via an external electronic portal.



### 6.2.1 OpenLine telephone

Whistleblowers can use the OpenLine telephone worldwide and free of charge if they wish to call us at the Group Reporting Office anonymously.

Availability via mobile phone depends on the mobile phone provider of the whistleblower. Freephone numbers with the dialling code 00 800 **cannot be reached** via individual providers. **If this is the case, please call the OpenLine telephone via landline.**

Please find an overview of the OpenLine telephone numbers here:

Country	Telephone Numbers
Argentina	coming soon
Australia	00 800 6736 5463
Austria	00 800 6736 5463
Belarus	00 800 6736 5463
Belgium	00 800 6736 5463
Brazil	00 800 6736 5463
Bulgaria	00 800 6736 5463
Chile	0056800914270
China	coming soon
Croatia	00 800 6736 5463
Cyprus	00 800 6736 5463
Czech Republic	00 800 6736 5463
Denmark	00 800 6736 5463
Estonia	coming soon
Finland	00 800 6736 5463
France	00 800 6736 5463
Germany	00 800 6736 5463
Greece	00 800 6736 5463
Hong Kong	00 800 6736 5463
Hungary	00 800 6736 5463
Iceland	coming soon
India	00918000509089
Ireland	currently not available
Israel	00 800 6736 5463
Italy	00 800 6736 5463
Japan	00 800 6736 5463
Kyrgyzstan	currently not available
Korea (South)	00 800 6736 5463
Latvia	coming soon

Country	Telephone Numbers
Lithuania	00 800 6736 5463
Luxemburg	00 800 6736 5463
Malaysia	00 800 6736 5463
Malta	coming soon
Moldova	currently not available
Netherlands	00 800 6736 5463
New Zealand	00 800 6736 5463
Norway	currently not available
Philippines	coming soon
Poland	00 800 6736 5463
Portugal	00 800 6736 5463
Romania	coming soon
Russia	currently not available
Singapore	00 800 6736 5463
Slovakia	00 800 6736 5463
Slovenia	00 800 6736 5463
Spain	00 800 6736 5463
Netherlands	00 800 6736 5463
New Zealand	00 800 6736 5463
Norway	currently not available
Philippines	coming soon
Poland	00 800 6736 5463
Portugal	00 800 6736 5463
Romania	coming soon
Russia	currently not available
Singapore	00 800 6736 5463
Slovakia	00 800 6736 5463
Slovenia	00 800 6736 5463
Spain	00 800 6736 5463
South Africa	00 800 6736 5463
Sweden	coming soon
Switzerland	00 800 6736 5463
Taiwan	00 800 6736 5463
Thailand	coming soon
Turkey	currently not available
Ukraine	00 800 6736 5463
United Kingdom	00 800 6736 5463
United Arab Emirates	coming soon
Uruguay	00 800 6736 5463
USA	00 800 6736 5463
Uzbekistan	currently not available

The head of the Group Reporting Office takes calls from people who wish to make contact via the OpenLine telephone during our office hours from **Monday to Friday from 9.00 a.m. to 5.00 p.m. (CET)**. However, we understand that we operate on different continents with varied time zones, so if the head of the Unit is not available, calls will be sent to other responsible employees within the Group Reporting Office.

If whistleblowers wish to **make contact in their native language**, or if they can only contact **us outside our office hours**, we recommend leaving a voicemail message with a telephone number so that we can contact this person as soon as possible. We guarantee that this number will not be tracked or permanently recorded, as it will only be used for callbacks and will be treated with the utmost confidentiality, in accordance with our policies and systems designed to protect the identity of reporters.

We would like to point out that callers are even better protected if they call the OpenLine telephone from a telephone outside the Jungheinrich telephone system, as the calling person's telephone number is then technically suppressed.

### 6.2.2 OpenLine Portal

The OpenLine can be used anonymously or non-anonymous:

- If whistleblowers do not state their name in their reports via the OpenLine portal, they will remain anonymous throughout the entire process.
- Reports filed via the electronic OpenLine portal are stored in a password-protected and encrypted form on specially secured servers of audimex GmbH, based in Germany.
- Access to incoming reports is only permitted and possible for the Head of the Group Reporting Office or authorised employees in the Group Reporting Office.

The safest way to access the Jungheinrich OpenLine Portal is to copy the following **URL** and then open it via the *browser* of any computer outside the Jungheinrich systems:

**<http://www.whistle-blow.org/JungheinrichAG>**

Otherwise, reporting persons can reach the Jungheinrich OpenLine directly via this link:

**[Whistleblow-org Jungheinrich](http://Whistleblow-org Jungheinrich)**

As of January 2026, anyone wishing to contact us can do so via the following language versions of the OpenLine portal DE, EN, FR, ES, GR, CZ, HU, PL. Additional languages will be added in accordance with legal or operational requirements.

Our internal working languages are **German** and **English**. However, we will return answers and results to the reporting person in his or her national language if this is required or desired.

## 7. How do we process incoming reports?

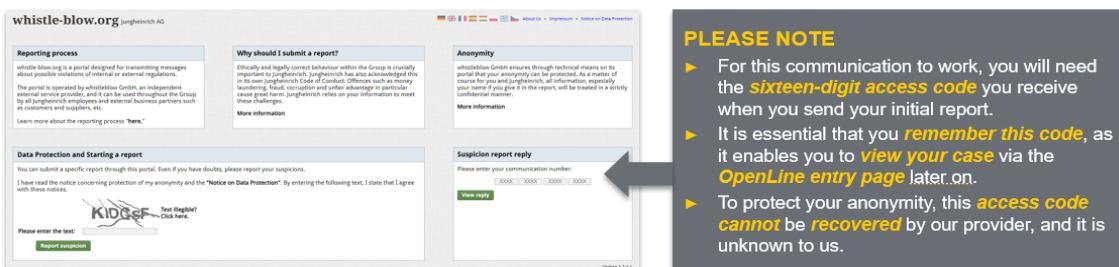


### 7.1 Receipt and confirmation of registration

If the Group's Reporting Office has received the reported information, confirmation of receipt will be sent within a **maximum period of seven days**, thus ensuring that the informant has proof that their report has been received and is being processed.

The informant must keep this confirmation through the channel used for contact, whenever technically possible. This means that:

- If the information has been reported by phone through OpenLine, confirmation will be provided verbally at the end of the call.
- If contact has been established by email, confirmation will be sent in writing to the address used.
- If the information is reported through the OpenLine Portal, the respondent must remember the **sixteen-digit access code** that is automatically generated when reporting the information. This code will allow the whistleblower to access the case later and consult the information or respond to the queries sent by the Reports Office. For security reasons, we do **not have the ability to recover or regenerate this code in the event of loss** (see figure below).



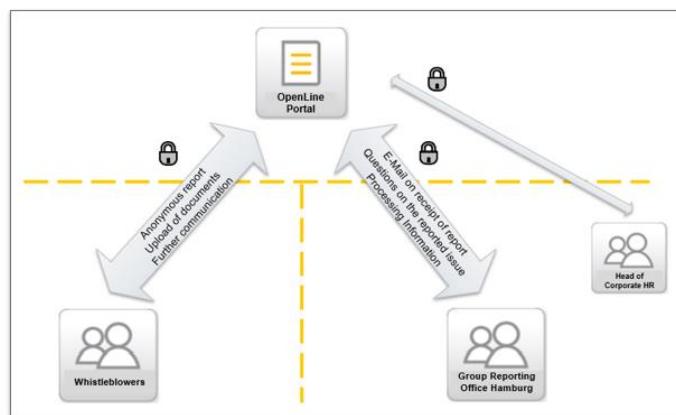
**PLEASE NOTE**

- For this communication to work, you will need the **sixteen-digit access code** you receive when you send your initial report.
- It is essential that you **remember this code**, as it enables you to **view your case** via the **OpenLine entry page** later on.
- To protect your anonymity, this **access code cannot** be **recovered** by our provider, and it is unknown to us.

Whistleblowers are encouraged to periodically check the status of their report through the OpenLine Portal using their access code. If additional information is required to advance the investigation, it will be notified through the portal, always maintaining the anonymity of the informant.

Anyone wishing to use the OpenLine portal to submit a report can also specify whether the report is directed against the head of the Group Reporting Office or his employees. If so, the report will be forwarded directly to the Head of Corporate HR at the Jungheinrich Group as an independent recipient at Jungheinrich and processed there.

This helps to avoid potential conflicts of interest and to ensure that incoming reports are clarified as fairly and independently as possible (see below).



## 7.2 Content of a notice

The following information in the report will help us to clarify it in a well-founded and results-orientated manner; however, this is not mandatory:

- What has happened?
- When did the incident occur or is it still ongoing?
- Where did it happen?
- Who are the persons or groups of persons concerned?
- Who or what could be the cause of the grievance, and which rules (internal or external) could have been violated?
- What damage could arise or has arisen?
- Are there any supporting documents (e.g., photos, documents)? If available, they can be uploaded via the OpenLine portal.

- Are there any witnesses?
- What remedial/preventive measures are considered useful or necessary?
- How can we as the Group Reporting Office communicate with the whistleblower (via the OpenLine portal, by e-mail / telephone contact or as part of a personal appointment)?

### **7.3 Processing of the information received**

The Head of the Group Reporting Office or his staff conduct an initial plausibility check and coordinate further audit procedures on this basis.

As a rule, the facts of the case are discussed with the whistleblower to be able to process the report carefully if it is technically possible to make contact.

Depending on the subject area concerned, the report will then either be clarified by the employees of the Group Reporting Office themselves, or it will be forwarded confidentially to selected internal contacts in other specialist departments / organisational units at Jungheinrich. In the case of reports relating to the Supply Chain Act, for example, these may also be neighbouring departments such as Sustainability, Purchasing, Human Resources or Occupational Health & Safety.

Compliance reports must be recorded, processed, documented, and reported in accordance with legal and/or internal deadlines and in compliance with corresponding internal guidelines. This is done to document the key stages of the investigation in order to guarantee the transparency and traceability of steps taken and decisions made.

### **7.4 Documentation**

The Group Reporting Office ensures the confidential handling, i.e., the recording, processing, and documentation of reports via closed IT systems. Only defined and trained employees have access here.

### **7.5 Conclusion and follow-up measures**

Notifications received are processed and, if possible, finalised within the specified deadlines.

Case processing is completed as soon as:

- the person responsible for processing the report has, to the best of his or her knowledge and belief, fully clarified and recorded the facts mentioned.
- follow-up measures or measures to avoid similar problems in the future have been defined.
- the report and its processing, including all supporting documents, have been documented and the Head of the Group Reporting Office has authorised the completion of the investigation.

Depending on the severity of the matter, follow-up measures or possible preventive or remedial measures include, for example, the following:

- Follow-up measures such as further discussions with persons involved, initiation of further comprehensive investigative measures, involvement of law enforcement or supervisory authorities.
- Preventive or remedial measures such as written warning, transfer, cancellation, termination of business relationships with business partners such as suppliers, additional training measures.

To ensure the effectiveness of the measures implemented, the Group Reporting Office does periodic reviews to assess the impact of defined corrective actions to prevent future irregularities.

## 7.6 Feedback to the whistleblower

Whistleblowers will receive feedback on the processing status of their report within **three months at the latest**, whereby we recognise the need to process reports received as quickly as possible.

In individual cases, this depends on the complexity of the case. And we would also like to give the person providing the report or the persons named in the report the opportunity to comment on the facts.

If the reported case is overly complex, the investigation may take longer than three months. We will inform the whistleblower of this in suitable time if we are able to contact him or her.

The Group Reporting Office will provide this feedback via the channel which was used by the informant to contact the Office (see also [Chap. 7.1 Receipt and confirmation of registration](#)).



## 8. What principles apply to our process?

### 8.1 Protection against adverse effects on the whistleblower

Whistleblowers can report substantiated violations and then enjoy corresponding protection.

Justified violations are deemed to exist if there are indications or concrete circumstances suggesting a violation of external or internal rules and if the person had sufficient reason to believe that the information provided was correct at the time the report was submitted, i.e., the person submitted the report to the best of his or her knowledge and belief.

Jungheinrich prohibits and sanctions any form of retaliation against whistleblowers, including, but not limited to:

- Dismissal, suspension or demotion.
- Unwarranted warnings or biased performance evaluations.
- Forced transfers or changes in working conditions without justification.
- Blocking promotion or training opportunities.
- Psychological pressure, harassment, or any form of indirect intimidation.
- Furthermore, any threat or attempt at retaliation is also prohibited.

If retaliation occurs during the processing of the report or even after the report has been processed, whistleblowers should contact the Group Reporting Office again directly, as retaliation will not be tolerated. If you have reason to believe there is a retaliation situation, please contact us again.

### 8.2 Dealing with deliberately false information

Deliberately false or defamatory statements in a report can have far-reaching consequences for the person concerned. The injured party is then entitled to compensation.

If it subsequently transpires that allegations were deliberately false or misleading, the identity of the reporting person may be disclosed, and this person may face internal

disciplinary sanctions or even legal action depending on the severity of the damage done.

### **8.3 Fair and independent processing of all reports**

Jungheinrich ensures the independence of the Group Reporting Office in organisational terms as an independent staff unit with a direct reporting line to the responsible member of the Board of Management and CEO, Dr Lars Brzoska.

Jungheinrich's internal guidelines apply to the investigation of reports. This means, for example, that the information is investigated as neutrally and objectively as possible. To this end, all aspects are examined, including those that may exonerate the accused person. Persons who are named in a report have the right to comment on any allegations made therein.

In addition, conflicts of interest in relation to the clarification of the information or the persons commissioned with the clarification must be excluded.

### **8.4 Data protection**

For the OpenLine portal, whistle-blowers can find the relevant information on data protection directly on the OpenLine portal page here: [whistle-blow.org Jungheinrich - Privacy Policy](http://whistle-blow.org/Jungheinrich-Privacy-Policy).

The processing of reports by the persons involved, i.e. the Head of the Group Reporting Office, his employees or, if applicable, persons from other departments involved in the processing of reports, is carried out in accordance with the GDPR and, in particular, in compliance with the required confidentiality in accordance with Section 8.6 of these Rules of Procedure (including restrictive disclosure of information obtained only to employees defined and trained in advance as part of the whistleblower system).

Persons responsible for a report must document all incoming reports in a permanently retrievable manner in compliance with the confidentiality requirement.

If the report is made by telephone / other type of voice investigation, the conversation may only be recorded with the consent of the person making the report.

Reports and their associated documentation will be retained for as long as they are required for clarification and subsequent assessment, or if Jungheinrich has a legitimate interest in retaining them or if there is a legal requirement to retain them.

### **8.5 Duty of confidentiality**

Not all reports or disclosures can be protected under the EU Whistleblower Directive. Security interests as well as confidentiality and secrecy obligations take precedence

(e.g. lawyers, notaries, doctors, pharmacists): Lawyers, notaries, doctors, pharmacists). However, there are cases in which, despite confidentiality and secrecy obligations, there is corresponding protection under the German Whistleblower Protection Act (HinSchG). It must be assumed that the report is necessary to uncover an offence. Affected persons are e.g.: Persons who have obtained business secrets / confidential information in a professional context.

### **8.6 Confidentiality**

The Group Reporting Office ensures the confidential handling of incoming reports via closed IT systems for receiving reports and subsequent case processing and documentation. Only defined and trained employees have access here.

Employees of the Group Reporting Office or other persons at Jungheinrich who participate in the case clarification are subject to a duty of confidentiality and have been instructed accordingly. In addition, information obtained as part of the case investigation may only be passed on restrictively in accordance with internal guidelines.

Information about the identity of the whistleblower may only be disclosed in exceptional cases. Disclosure is possible, for example,

- in criminal proceedings at the request of the criminal prosecution authorities,
- based on an order in an administrative procedure following a notification, including administrative fine proceedings,
- based on a court decision,
- or if the disclosure is necessary for follow-up measures and the person providing the information has consented to the disclosure.

### **8.7 Participation rights of employee representatives**

If it emerges during the processing of the report that the relevant works council has participation rights, it will be involved accordingly.

### **8.8 Assumption of costs as part of the complaints procedure**

Any person providing information can make use of the described procedure free of charge.

### **8.9 Contact possibility with official reporting centres**

Employees are free to contact the internal Group reporting Office or an external<sup>2</sup> reporting office, depending on national regulations.

However, Jungheinrich encourages all employees and external third parties to first contact the internal contact persons at Jungheinrich with their reports or to use the Jungheinrich reporting channels offered.

This gives us the opportunity to follow up the report as effectively and appropriately as possible. If an internally reported violation has not been remedied, the person providing the information is at liberty to contact an external reporting centre.

## **9. Review of effectiveness**

We review the effectiveness of the complaints procedure at least once a year and on an ad hoc basis.

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<sup>2</sup> External reporting offices are e.g.:

- **Federal Office of Justice**, Adenauerallee 9-103, 53113 Bonn (see [website](#));
- **Federal Financial Supervisory Authority** (BaFin), Whistleblower Reporting Centre, Graurheindorfer Straße 108, 53117 Bonn (see [website](#));
- **Bundeskartellamt**, Kaiser-Friedrich-Straße 16, 53113 Bonn (see [website](#)).