

## Goal & Scope

Our corporate mission “Creating Sustainable Reliable” Logistics or CSR logistics not only drives our business activities but also represents the essence of how we act on Corporate Social Responsibility matters.

As ECS is committed to a positive, solution-oriented and respectful workplace, ECS wants to embed these values in a culture where anyone can raise concerns in good faith without having to fear any adverse consequences. This in line with our CSR Policy.

The goal of this procedure is to provide all ECS employees and external parties related to ECS a safe and anonymous channel to raise any concerns about suspected or actual criminal conduct, unethical conduct or other misconduct by or within ECS with regard to (This list is inclusive but not exhaustive):

- Accounting, internal account controls or auditing matters
- Corruption or bribery
- Discrimination or harassment
- Fraud
- Information security concerns
- Theft

This procedure is not intended for complaints in relation to service levels, policy decisions, or an employment-related grievance with another person within this organization.

## Internal Procedure

ECS Employees are encouraged to first discuss actual or suspected irregularities with the employee's first point of contact. This remains the manager or the hierarchical superior of the employee, who is directly authorized to offer a solution to the problem posed. If the engagement of these persons remains unsuccessful or if the employee feels unable to talk to his/her hierarchical superior, he/she can use the internal whistleblower procedure.

In this case the employee can raise the matter to the HR Director. If the concern falls within the scope of the whistleblower process, the HR Director will conduct an investigation. This investigation will occur as soon as reasonably practicable, taking into account the complexity and the nature of the concern.

The employee who submitted the concern in good faith, will receive feedback about how the concern has been dealt with, whether any corrective measures have been recommended and if any further steps will be taken.

## External Procedure

The external procedure is set up for all external parties related to ECS in addition to the internal procedure for employees. When anyone has the feeling there is no possibility for open dialogue at ECS, they can use the “report fraud” button at the contact page of ECS' website. By using this form anyone can report anonymously their concern about ethical misconduct. A name and e-mail address can be communicated and an e-mail with the message or question will be sent to the CHRO. In all cases, all reports will be investigated and corrective action will be taken if warranted. The disclosed external party will receive feedback on the way his concern is dealt with, within a reasonable timeframe.

## **Confidentiality**

ECS emphasizes that these concerns are treated in strictest confidence. The information provided as well as the identity of people involved or potentially involved shall be kept strictly confidential, consistent with the need to conduct an adequate investigation. The name of the whistleblower is not disclosed to any person potentially implicated in the reported concern, this within the limits as defined by applicable laws and regulations.

## **Non-Retaliation**

ECS is committed to ensuring that those who raise a concern in good faith, are provided support and protection from retaliation. Retaliation is inclusive of demotion, termination, suspension, harassment<sup>1</sup> or discrimination<sup>1</sup> in any other matter, as a result of reporting a concern. Any person found to be in violation of this non-retaliation obligation is subject to disciplinary measures up to and including termination of employment.

*Ref: Harassment & discrimination - Work Regulations Appendix 1 (Q&A: contact HR Director)*