



WHISTLEBLOWER POLICY

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Goal & Scope

Our corporate mission “**C**reating **S**ustainable **R**eliable” Logistics or CSR logistics not only drives our business activities but also represents the essence of how we act on **C**orporate **S**ocial **R**esponsibility 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 code of conduct and the applicable whistleblower laws and legislation.

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
- (fiscal or social) Fraud
- Information security concerns
- Transport safety
- Environmental protection
- Consumer health and protection
- 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.

Procedure internal ECS parties (f.ex employees)

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.

If an ECS employee wishes to use the internal whistleblower procedure, the employee can raise the matter to the whistleblower officer (CHRO) either by verbal or written report. The employee indicates, either verbally or written, that they are making use of the whistleblower procedure. Within seven days after receipt of the concern, the whistleblower officer will confirm the receipt. If the concern falls within the scope of the whistleblower process, the whistleblower officer 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, 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. This communication will be provided within a maximum of three months after acknowledgement of the concern.

Procedure external ECS parties (f.ex suppliers, customers,...)

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 whistleblower officer (CHRO). In all cases, all reports will be investigated and corrective action will be taken if warranted. The disclosed external party will receive confirmation of the receipt within seven days as well as feedback on the way the concern is dealt with, within three months after acknowledgement of the concern.

External reporting channels

If anyone has the feeling that the internal reporting channels provided by ECS are insufficient to report their concern, an external notification can be done using the provided external governmental channels (f.ex Flemish Ombudsman service).

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, as well as related facilitators and possible related retaliation victims, are provided support and protection from retaliation. Retaliation is inclusive of demotion, termination, suspension, harassment¹, discrimination¹, negative reviews, disciplinary sanctions, financial sanctions, withholding training or promotion, 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 as well as possible fines or imprisonment in line with the applicable laws and legislation.

Ref: Harassment & discrimination - Work Regulations Appendix 1 (Q&A: contact CHRO)