

# **Speak Up Policy**

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# 1. Purpose

# 1.1. Purpose

Evos is committed to conducting business with integrity, fairness and high ethical standards, with respect for the law and Evos' values. In spite of this commitment, Evos is inherently exposed to risk, operating in multiple jurisdictions and as a player in global business. You may therefore one day observe conduct that concerns you, or that seems to violate our Code of Conduct or our policies. If you observe or suspect such misconduct, you are encouraged to speak up. By doing so, you give our Company the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and undermine trust.

Our Company truly values and encourages a culture of openness. The help of employees who identify and speak up about potential concerns that need to be addressed is vital to that culture. Seeking advice and speaking up are therefore encouraged and employees who seek advice or speak up are protected at all times. There will be no adverse consequences for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for speaking up. Again, speaking up is vital for Evos to sustain its reputation and success.



# 2. Seeking advice and speaking up

# 2.1. Who can seek advice or speak up?

We invite all employees and management to seek advice, speak up or raise their concerns. We also invite other stakeholders, such as agents, suppliers or distributors to notify us if they identify breaches of law or unethical conduct. The Speak Up Policy applies in all jurisdictions where Evos does business.

#### 2.2. What concerns are covered by this Speak Up Policy?

This Speak Up Policy can be used to raise concerns about suspected misconduct within Evos, that is: any violation of Evos' Code of Conduct or the Evos policies under which Evos operates. Examples of potential misconduct include, but are not limited to:

- breach of laws or regulations;
- breach of the Evos Code of Conduct
- or other EVOS policies, standards or codes;
- criminal activity;
  bribery or corruption;
- conduct endangering health and safety, or
- causing damage to the environment;
- conduct likely to damage Evos's financial position;
- · dishonest or unethical behaviour;
- unauthorised use of Evos's confidential or proprietary information;

- conduct likely to damage Evos's brand, reputation or relationships with others (for example,

customers, business partners, governments and regulators);

- · anti-competitive behaviour;
- deliberate release or non-authorised
- possession of proprietary or private data;
- victimisation or harassment;
- · financial fraud or mismanagement;
- $\cdot$  conduct that represents a danger to the
- public or to the financial system;
- non-disclosure of a material cyber security breach;
- conflicts of interest;
- retaliating against or causing detriment to a person who speaks up;
- deliberate concealment of the above.

# 2.3. How to speak up?

Evos encourages you to seek advice and speak up through a number of channels. We promote an open feedback culture. Employees and all relevant stakeholders who observe or suspect a possible violation of our principles in our operations or the supply chain are encouraged to report their concerns. If you note or suspect potential misconduct, Evos might not be aware of this illegal behaviour. You are encouraged to raise this so we can take appropriate measures.



Please feel free to address your concerns with your direct manager or supervisor as employee's first resource. If a manager or supervisor is not available, or even if you are not comfortable discussing the matter with your direct manager or supervisor the following resources are also available:

- The HR Manager at the Terminal;
- The Manager's Manager or the Managing Director at the Terminal;
- The designated Terminal Compliance function;
- The Evos Group Compliance Manager.

If you do not feel comfortable doing that either, please feel free to address any potential misconduct or serious allegations and report concerns, you can file a concern online, please file a report at the Evos Integrity Line (evos.integrityline.com).

All reports are made confidentially and may even be made anonymously on request, providing that this is feasible and permitted by law. As **Annex I** a **Speak Up Flow Chart** has been attached.

#### 2.4. What kind of information do you need to provide?

We encourage you to speak up as soon as possible, as it may be crucial for the remediation of the potential misconduct. We therefore fully understand if you do not have available all relevant information yet.

However, when you are encouraged to provide as much information – and as detailed as possible – as you can to enable Evos to assess and investigate your concern, such as:

• The background, history and reason for the concern;

· Names, dates, places and other relevant information; and

- Any documents that may support your report. The Evos Integrity Line (evos.integrityline.com) will help you submit requested information.



### 2.5. What happens when I report a concern?

Evos is committed to ensuring that all reports of suspected misconduct are handled effectively, professionally and in line with our values. All reports of suspected misconduct made under this policy will be handled by the Group Compliance Manager. Management and HR will forward all reports made to the Group Compliance Manager for follow-up. If you report through the Evos Integrity Line, you will remain anonymous unless you choose to reveal your identity and if allowed by the local laws. The Evos Integrity Line is operated by EQS Group, a thirdparty service provider, and you will remain anonymous, also to the Evos Group Compliance Manager.

# 2.6. Does my report remain confidential and will my privacy remain safeguarded?

All reporting is done confidentially. This means that information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake.

We are obliged to inform the implicated person that a complaint has been filed against him/her, unless doing so would seriously hinder the investigation or if delaying notification is otherwise justified. In any case, your identity will not be disclosed. However, we cannot guarantee that the subject does not draw his or her own conclusions, based on the allegations presented to him or her. You yourself can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

As for your privacy, Evos will do everything to safeguard personal data. Your personal data will be processed in full compliance with the Evos Group Privacy Statement and the GDPR. The reporting through the Evos Integrity Line is facilitated in a secured environment (incl. online available privacy statement).

# 2.7. You will be protected You should not be afraid to seek advice or speak up.

Evos does not accept any form of retaliation against those who report in good faith. This means that you are protected from any type of harassment, bullying, demotion or other type of adverse reactions when you speak up. Should retaliation occur, please report it to your local management, local support functions immediately (HR, Compliance or Legal) or to Management. Measures will be put in place to correct such behaviour. Disciplinary action will be taken against those who retaliate.



# ANNEX 1: EVOS SEEK ADVICE AND SPEAK UP FLOW CHART

