

## Questions and answers regarding the whistleblowing channel

### 1. When should I make a report?

You should raise a concern when you observe unethical behaviour conducted by Relais Group's management, employees or associates. There is no need to have an evidence or complete assurance of a violation to make a report: it is sufficient that you have a strong suspicion and that you make the report sincerely.

We suggest that for an employee of Relais line manager is in the best position to address area of concern. If this reporting channel is deemed inappropriate due to the individuals involved, concern should be reported to the senior management such as CFO, CEO or Chairman of the Board. If you feel you cannot discuss the matter with them, we encourage you to report concerns anonymously through the whistleblowing channel.

Business associates and other stakeholders may discuss concerns with their contact person at Relais Group or report the suspicion through the whistleblowing channel.

If your concern relates to a customer complaint, service suggestion or quality issue, please talk to your sales person, to customer support.

### 2. What is considered as unethical behaviour?

Unethical behaviour includes among others:

- Non-compliance with laws and regulations
- Unfair competition
- Health and safety issues
- Discrimination or unequal opportunities
- Bullying or harassment
- Breach of data protection and security
- Risks to the environment
- Corruption, bribery or conflicts of interest

### 3. How is my report processed?

Relais Group's external service provider will receive reports sent through the whistleblowing channel. The external service provider acts independently, processes all the reports confidentially and will discuss the report with appointed Relais' representatives.

When the report is made, the whistleblower receives a personal ID number and a password, to use in the report related communication, anonymously, confidentially and securely. The external service provider will assess whistleblowing reports severity and urgency.

All information relating to the report and possible investigation will be treated with the highest confidentiality: only those with a legitimate reason to participate in the investigation will have access to related information and findings. People under, or related to, suspicion are not allowed to participate in the investigation.

### 4. How can I be sure to stay anonymous and not face negative consequences for making a report?

A whistleblower who does not disclose their identity when making the report, will be anonymous throughout the whole investigation, to Relais Group and the external service provider. The WhistleB platform does not save metadata and IP addresses cannot be traced. Relais Group will not attempt to find out the whistleblower's identity in any way.

Relais Group takes accusations of violations very seriously. If whistleblower provides contact information, Relais Group is responsible for protecting the informant's identity and ensuring no retaliation from the company or its representatives will take place towards the informant.

If investigating the suspicion leads to criminal investigation by the authorities, case information will also be given to those entities and individuals participating in the investigation, who are legally entitled to receive the information. This applies to the whistleblower's contact information if he or she provided it.

## **5. What consequences might follow the individual named in a report?**

Based on the findings of the investigation, appropriate corrective measures will be taken, This may include further training or disciplinary action for the individual named in the report. Relais Group will not take disciplinary action towards people under suspicion before the investigation has been completed.

A business associate who has found to have breached Relais Group's ethical norms, fair business practice or has broken the law may face negative consequences including termination of their business relationship, liability for damages and criminal liability.

Anyone found to have retaliated against or victimised someone for making a report or for assisting in an investigation will be subject to disciplinary action under our disciplinary procedures.

Malicious false accusations will be investigated and may be subject to disciplinary or legal action.