



ASBISc Enterprises Plc

**Whistleblowing Policy
And
Report**

ASBIS GROUP - Whistleblowing Policy 2019

PART I

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, behavior). This may also include:

- General Malpractice – illegal or unethical conduct
- Misconduct
- Breach of a legal requirement
- Breach of any Company Policy
- Breach of codes of conduct
- Breach of Business Ethics Policy
- Criminal Offences
- Any violations of internal and external policies and laws of ASBIS Group and or its employees

ASBIS Enterprises Plc. is committed to conducting its business with honesty and integrity and we expect all staff to maintain high standards in accordance with our policies and procedures.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible and their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those issues
- To reassure staff that they should be able to raise concerns without fear of reprisals, even if they turn out to be mistaken.

Whom does this policy apply to?

This policy applies to everyone who carries our work for ASBIS Enterprises Plc and its entities internationally, including:

- All employees
- Partners
- Contractors
- Consultants

Link to Code of Conduct

The Code of conduct includes guidelines generally describing and prescribing the conduct that is expected of employees. The Code of conduct point out the existence of the whistleblowing to employees.

PART II – How does ASBIS deal with whistleblowing reports?**1. Who do I contact?**

Malpractices will be reported in writing to the whistleblower Committee. The whistleblowing Report is available in all entities and can be downloaded from anyone in the website of the Company. The report should be sent to the Whistleblower Committee whistleblowercommittee@asbis.com. The whistleblower will receive confirmation (If it won't be anonymous) of receipt of the Whistleblower report from one the members of the Committee.

The Whistleblower Committee consists of:

- Two Executive Directors
- Head of Legal
- HR Department of the HQ

The whistleblower Committee will also appoints a secretary.

The Whistleblowing Committee is responsible for dealing with and settling reports made in the context of this policy ('Whistleblower report').

In case, the Whistleblower Report concerns a member of the Whistleblower Committee, then that member will temporarily withdraw and will not be involved when the Whistleblower Committee deals with the Whistleblower report.

2. Confidentiality

All Whistleblower reports will be dealt with in strict confidentiality. Confidentiality will be maintained as far as possible in accordance with the need for an effective inquiry into the Whistleblower report. The Whistleblower report and the related information will only be disclosed or made available to the Whistleblowing Committee.

Whistleblowers can also request full anonymity and the whistleblower's name will not be written or reported anywhere.

3. Protection of the Whistleblower

ASBIS guarantees that a Whistleblower report made in good faith about a possible infringement or malpractice will not have any negative consequences to the employee's position, neither any effect on the whistleblower's fixed or variable remuneration, and that this will not have a negative impact on the whistleblower's regular performance reviews.

4. Inform interested parties about the Whistleblower reports

The employee who will be reported, will be informed that someone report him. The employee shall be informed about the procedure, his rights and the list of people who might receive the whistleblower report. The employee will be offered the opportunity to give his view on the Whistleblower report.

The Company has the right to add employees personal data as the employee has already signed the consent of GDPR.

5. Process and decision-making

The Whistleblower committee will process the Whistleblower report and will decide whether or not to start an inquiry in connection with the Whistleblower report based on the information that has been received. The whistleblower will be notified of this decision and the reasons on which is based.

Other person or department within ASBIS, or If desirable or necessary, external persons or parties, will be involved when processing the Whistleblower report and any inquiries. The inquiry shall fulfill the requirements of an investigation conducted with due care, including that of hearing both sides of the case.

The Whistleblower Committee will present its finding to the Executive Directors of ASBIS and they can decide further actions.

For each of the procedures, unless specific circumstances prevent this, the whistleblower will be informed in general sense about the progress and the findings. The Whistleblower does not have the right to access, or to examine the full finding.

In case the alleged employee does not agree with the findings or the procedure followed by the Whistleblower Committee, can object to one of the Executive Directors who is member of the Whistleblower Committee.

6. Abuse of whistleblower scheme

Making a malicious Whistleblower report or an incorrect report may, depending on the seriousness of the inaccuracy or the intentions of the whistleblower, be deemed abuse of this policy and result in termination of employment or other consequences for the whistleblower.

7. Reporting

The Whistleblower Committee will issue an overview of the Whistleblower reports received at the beginning of each year for the previous year. The overviews will not contain any information on the reported issues nor the identity of the employees mentioned in the Whistleblower report, or the identity of the whistleblower.

8. Data

Personal data processed in a Whistleblower report shall be dealt with in accordance with the ASBIS Privacy Policy and kept for the period of the investigation. After having closed the investigation, personal data shall be deleted promptly but in any event within two month after the finalization of the investigation. When legal or disciplinary measures are initiated, the data shall be kept until the conclusion of the finalization of the case.

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