



Procedure – Speak Up at Royal Den Hartogh Logistics

1. Introduction

This Procedure applies to all employees (whether permanent, fixed-term or temporary) of Royal Den Hartogh Logistics, and other individuals performing functions in relation to Den Hartogh, such as agency workers, consultants and interns. The persons referred to in this Procedure are hereafter collectively referred to as “employee(s)”.

This Procedure outlines in detail the Speak Up process (part of our Code of Conduct) that employees should follow if they want to report behaviour or a situation that they deem to be unsafe, unethical, potentially damaging, unlawful or inconsistent with our Code of Conduct (hereafter collectively referred to as “wrongdoing”).

The purpose of this Procedure is to make all employees aware of our commitment to eliminating wrongdoing within our business and to inform them as to how they can help us do so by confidentially reporting their concerns to us without fear of reprisals, using the reporting Procedure described below. We also wish to make employees aware that any report they choose to make will be treated with the strictest confidence and that they can be assured that they will not suffer any reprisals for any report they make.

Den Hartogh wishes to encourage all employees, who have concerns about any wrongdoing, to feel able to come forward and voice these without fear and in confidence. It is important that concerns are raised at the earliest time possible as this will allow us to address and resolve any concerns quickly.

It should also be noted that the escalation procedure is available to any external third parties, including customers and suppliers, should they identify activities which they believe should be reported to the Whistleblowing Team.

2. Roles and Responsibilities

Board Members and Senior Leadership

- Promoting and providing a safe culture and environment where employees are confident that they can speak about concerns without fear of reproach or recrimination.
- Ensuring that mechanisms are in place and delivered within their area of responsibility to facilitate the proper process in case concerns are raised.

Line Managers

- Providing a safe environment where all employees are comfortable speaking up about concerns.



- Ensuring that any concerns raised are treated seriously and dealt with promptly in accordance with this Policy and Procedure, including informing the Whistleblowing Team (see below) of all concerns reported to them.
- Maintaining confidentiality, as appropriate, of the employee(s) expressing the concern.
- Not deterring, bullying, isolating or otherwise victimizing anyone using this Procedure or destroying information about wrongdoing, all of which may result in disciplinary action.

Employee(s)

- Reporting and pursuing concerns reasonably believed to be a wrongdoing or in the public interest.
- Raising concerns to the appropriate person in the appropriate way in line with this Procedure.
- Not to raise or pursue any malicious or vexatious allegations relating to the department or colleagues.

Whistleblowing Team

To facilitate the Speak Up process in case of breaches of law (Whistleblowing) Den Hartogh has installed a dedicated independent team that will handle incoming reports and follow-up thereafter. The Whistleblowing Team consists of the Risk Manager and the Group Financial Manager.

The Whistleblowing Team will also take on the responsibility of the Person of Trust in countries where Den Hartogh does not have a Person of Trust in place. In countries where Den Hartogh has a Person of Trust in place employee(s) can contact them via the existing procedures.

In the event of any decision being challenged following the review by the Whistleblowing Team, it may be escalated to the Group CEO.

3. What is a concern?

Here are just a few examples of the types of wrongdoing an employee may wish to report:

- Criminal offence;
- Unlawful acts;
- Improper and/or unethical behaviour;
- Endangering the health or safety of any individual;
- Miscarriage of justice;
- Financial malpractice, impropriety or fraud;
- Mishandling or risks to data and/or information;
- Failure to comply with a legal obligation;
- Breaches of (departmental) policies and procedures, or of our Code of Conduct;
- Deliberate concealment of any of the above.



Furthermore, if an employee is asked to do something, or is aware of the actions of another, which they consider to be wrongdoing, they can raise it using this Procedure.

4. Raising a concern

If an employee experiences something in the workplace that they consider to be unsafe, unethical, potentially damaging, unlawful, or inconsistent with our Code of Conduct, it is important that the concern is raised immediately. There are several ways to speak up:

- Discuss the worry or question with the direct manager.
- Discuss the worry or question with another manager within the team or location.
- Discuss the worry or question with another manager.
- Contact People & Culture or Person of Trust.
- Contact the Den Hartogh Whistleblowing Team via whistleblowing@denhartogh.com or by calling the dedicated telephone line on 00 31 88 162 0009.

Contacting the Den Hartogh Whistleblowing Team is considered to be the appropriate route if:

- A breach of law is suspected;
- It is suspected that the concern may implicate the line manager in some way;
- The concern relates to Senior Leadership or Board Members;
- It is felt that the concern is particularly serious and urgent and the employee is worried that approaching the line manager in the first instance may delay or impact the resolution of the matter;
- An employee has raised a concern with the line manager but does not feel it has been adequately addressed.

5. Whistleblowing Procedure

The Procedure starts when the employee reports the concern with the Whistleblowing Team via whistleblowing@denhartogh.com or via the dedicated telephone line.

With the concern the following information should be provided where possible:

- The nature of the concern and its key elements
- When it happened
- Who was involved.

In addition to details of the concern, an employee should try to provide the following information:

- The background and reason behind the concern
- Whether they have already raised a concern with anyone and the response
- Any other relevant dates
- If applicable, any personal interests must be declared from the outset.



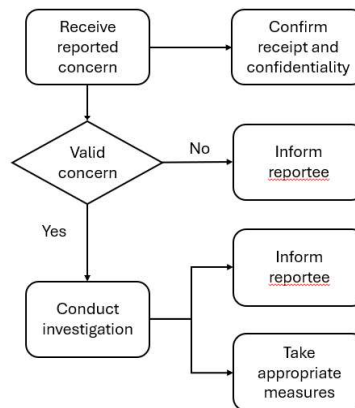
If you prefer, you may contact the Whistleblowing Team by telephone using the dedicated number. You will be directed to an answerphone to ensure confidentiality. We ask that you please leave your contact details, confirm the relevant time zone, and propose 3 convenient times for us to call. We will endeavour to respond within 2 working days.

To maintain confidentiality, concerns communicated to the Whistleblowing Team should not be communicated to additional parties.

It is important that matters are not investigated by employee(s) themselves. Proof is not needed, just a reasonable, honest belief that wrongdoing, as defined in Whistleblowing legislation, has occurred or is likely to occur.

Expiry dates to raise concerns are as per local legislation. Thereafter, the Whistleblowing Team can decide whether a concern is admissible.

The chart below highlights the process, with more details included in Appendix A attached hereto.



Please note that a manager who has been approached about a concern and is not sure what to do, can get support and advice from the Whistleblowing Team.

6. Confidentiality

The best way to raise a concern is to do so openly as this makes it easier for the Whistleblowing Team to investigate and provide feedback. However, the Whistleblowing Team recognizes that there will be employees who may not express their concerns due to fear of reprisal, worry of not being taken seriously or of being perceived as 'disloyal.'



Any disclosures made under this Procedure will be treated in a sensitive and confidential manner. The Whistleblowing Team will recognize that the employee may want to raise a concern in confidence, i.e. they may want to raise a concern on the basis that their name is not revealed beyond the disclosure route without their consent.

The Whistleblowing Team will take steps in the investigation to ensure that confidentiality is maintained as far as possible and will work to protect the identity of the employee who raised the concern. This should be possible in the majority of cases, and any document, report or recommendation prepared by the Whistleblowing Team in relation to the matter will not identify the employee raising the concern unless:

- The employee has consented to their identity being exposed in writing, or
- There is evidence to show that the employee who raised the concern has acted maliciously, or
- The Whistleblowing Team is under a legal obligation to do so, or
- The information is already in the public domain, or
- It is necessary for the matter to be dealt with properly or fairly, or
- It is on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

All parties will be under an obligation to use all reasonable actions to ensure that they keep the matter and all information relating to the disclosure strictly confidential except, as permitted under this Procedure, as required by law or until such time as it comes into the public domain.

7. Protection

An employee will not be penalized for raising a concern, provided we are not obligated to report the concern to the local authorities. The Whistleblowing Team will protect any employee who raises a concern. This also applies when a concern is reported anonymously, although the measures to guarantee protection in that case may look different. Where an employee has been victimized for raising a concern, the Whistleblowing Team will take appropriate action against those responsible, in line with the Code of Conduct.

8. Non Substantiated Claims

Den Hartogh reserves the right to take appropriate disciplinary actions where reports are identified as being intentionally false and/or malicious.



APPENDIX A: Details of Whistleblowing Process

1. The employee will receive written acknowledgement of the receipt of a report within 7 business days, and the Whistleblowing Team may enquire if appropriate whether it would be acceptable for the Team to discuss with appropriate members of staff
2. The Whistleblowing Team will review the initial information and report to establish where it meets the criteria of a Whistleblowing case:
 - a. In the public interest, and
 - b. An act of illegal, unethical or improper activities occurring within the organisation.
3. A confidentiality letter will be signed by any parties contributing to the investigation.
4. The Whistleblowing Team will review the information and identify additional information required, including whether it should be sought by an impartial external investigator, and whether to refer to local authorities for appropriate investigation. The manner in which it is handled will depend on the type of misconduct.

TYPE OF MISCONDUCT			
1	Financial	5	Corruption
2	Harassment and discrimination	6	Unethical or irresponsible behaviour
3	Health and safety	7	Workplace retaliation
4	Environmental	8	Other

5. Anyone interviewed as part of the process is to be advised of the status of the investigation within 7 business days, with an interim notification if additional time is required.
6. During investigation employees may be put on garden leave after consultation with the business.
7. The Whistleblowing Team will confirm within 14 business days after receipt of the report:
 - a. How it is proposed to deal with the matter
 - b. Whether further investigations will take place, or if not deemed appropriate, why this decision has been made
 - c. An estimate of how long it might take to provide a final response
 - d. What support can be offered to the individual raising the concern.
8. The Whistleblowing Team will decide whether the report makes it necessary to include additional persons in the further investigation. The selection of additional persons depends on topic and background (e.g. language and specific knowledge) of the employee who reported the concern. This 3rd person will contribute to the careful and accurate handling of the concern.



9. The investigation should be concluded within 3 months of the matter being raised, though some scenarios may result in a longer timeframe. The report will always be handled fairly and in accordance with the Whistleblowing Procedure. All investigations will be conducted sensitively and as quickly as possible.
10. Once the investigation has been concluded, the employee will receive an explanation about how the matter has been addressed. If there are legal constraints, e.g. a criminal investigation, the employee will receive sufficient information about the outcome of any investigation to enable them to be informed that the concern has been dealt with. If no further action is proposed the Whistleblowing Team will inform the reasons for this in writing to the employee who has raised the concern.
11. The Whistleblowing Team may decide that no further action will be taken under this Procedure in the following (not exhaustive) set of circumstances:
 - a. If, after investigation, there is no evidence that misconduct within the meaning of this Procedure occurred, is occurring or is likely to occur
 - b. If the matter concerned is already the subject of legal proceedings, or has already been referred to the police or other public authority.
12. If the investigation is not completed within 3 months or in the time originally estimated for the investigation, the Whistleblowing Team will provide regular updates as agreed with the employee. Throughout any investigation, the employee will still be expected to continue their duties/role as normal unless deemed inappropriate.
13. The outcome of the investigation may be shared with the Group CEO, to whom the whistleblower can appeal if the whistleblower does not accept the findings of the investigation.
14. The Whistleblowing Team will ensure that incoming reports and all associated documents are registered adequately and in a secure manner.
15. The Whistleblowing Team will report annually to the Board via a Business Ethics report on incoming reports, the investigation and findings therefrom.
16. The Whistleblowing Team will recommend necessary remedial steps, including amendments to processes, and disciplinary actions and/or reporting to internal and external authorities as appropriate.