



## Whistleblowing policy

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## Purpose of this policy

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Euroports is **committed to maintaining a high standard of integrity, transparency, and ethical behaviour**. Respect and integrity are core values in our organisation.

It is in the interest of Euroports and its staff to tackle misconduct properly and promptly. This allows us to prevent greater harm, avoid reputational damage, and hold those responsible accountable.

This policy offers confidential communication channels to report concerns about illegal or unethical conduct within our organisation without fear of retaliation.

Those whistleblowing channels are additional to the possibility to discuss concerns in an informal manner with your supervisor/manager, HR, Legal, QHSE or other relevant colleagues or, for non-staff members, with your contact person at Euroports.



It is **important that any (possible) misconduct is reported, so that Euroports can address the problem**.

Keeping quiet about misconduct can make the situation worse. Reporting concerns contributes to a responsible and positive company culture.

For EU entities, this policy also constitutes an implementation of EU Directive 2019/1937 ‘on the protection of persons who report breaches of Union law’ and the respective national implementation legislation, within the limits of their scope of application.



## Scope of application

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This policy is applicable to all entities of the global Euroports group.

It applies to **all persons who come into contact with Euroports in a work-related context**, meaning:

- all persons working for the Euroports entities, including its employees, consultants, project consultants, temporary or agency workers, trainees and management (jointly referred to herein as “**staff members**”); and
- all other persons with a current, past or prospective professional relationship with Euroports, including former staff members, job applicants, shareholders, board members, staff of suppliers, staff of customers, dockers (if not employed by Euroports), etc. (jointly referred to herein as “**non-staff members**”);

(jointly referred to in this policy as “**you**” or “**the whistleblower**”).



## Voluntary use of whistleblowing channel

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You are encouraged to speak up and discuss any concerns about potentially illegal or unethical conduct.

The use of the whistleblowing channel set out in this policy is, however, completely voluntary.

Instead of using the whistleblowing channel, you are free to raise your concerns via:

- your supervisor/manager;
- the HR, Legal or QHSE department;
- another relevant colleague; or
- your contact person at Euroports.



## What can be reported

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Our whistleblowing channel can be used to report conduct that:

- **breaches the law** (national, EU or international law); or
- **violates our Code of Conduct or other company policies.**

It cannot be used to report an incident or complaint that is not linked to a breach of a legal rule or a violation of a company policy, such as individual employment matters, suggested improvements to our way of working, difficulties within a team, or questions about the interpretation of our policies.

The whistleblowing channel is also not intended for reporting of dangerous situations requiring urgent intervention.

To address such issues, you should use other appropriate channels (such as the QHSE-tool, your supervisor, your HR business partner, ...).

If you are uncertain whether a matter is within the scope of the whistleblowing policy, you can seek guidance from our whistleblowing officers.



## How to report

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You can submit a whistleblowing report **by calling our whistleblowing officers or via our online whistleblowing tool.**

- **Calling our whistleblowing officers**

You can find the phone number of the whistleblowing officers appointed for each country on our website (under the section 'ESG' > 'Whistleblowing') and for staff members, also on our company intranet. Select the country to which your report relates.

- **Our online whistleblowing tool**

The link to the tool is mentioned on our website (under the section 'ESG' > 'Whistleblowing') and for staff members, also on our company intranet.

Via this tool, you can submit a report in writing or via a voice recording system. The start page of the tool gives practical guidance on how to use it.

When you submit a whistleblowing report, you may always **request a face-to-face meeting** with a whistleblowing officer.



## Reporting anonymously

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**Our online whistleblowing tool allows to submit reports anonymously.** This means that your identity is not known to us nor to the provider of the tool.

Your anonymity is ensured via several measures:

- No cookies or tracking is applied on the reporting page. The tool does not track or store the IP-address or Machine ID of the device used to report.
- Metadata (e.g. information about the author of a file, time and place the file was created) are automatically removed from all files you may upload to the tool.
- If you choose to report orally (via the voice recording system), the tool can distort your voice so that it cannot be recognised.



## Handling of reports

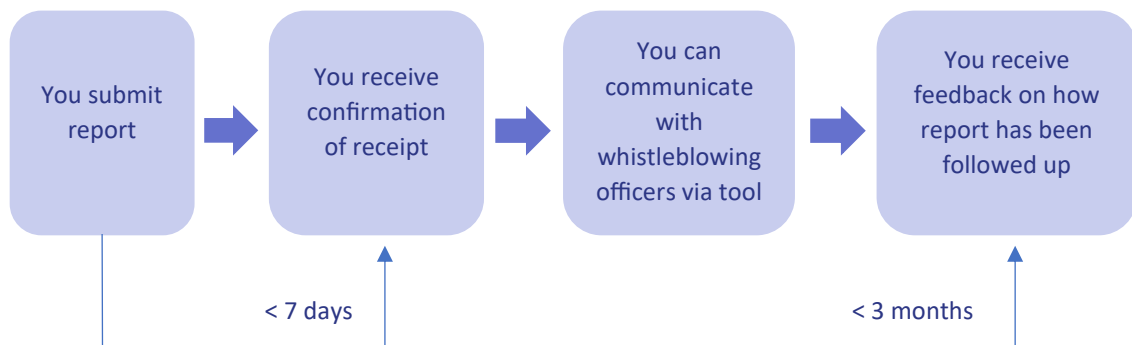


All reports are **received (only) by our whistleblowing officers**.

These officers are Euroports staff members who have been specifically appointed and trained to handle whistleblowing reports in an impartial and confidential manner.

The **country-specific sections in annex A to this policy** describe who are the whistleblowing officers for each country in which Euroports operates.

If you indicate in the online tool that your report relates to the department in which one of the whistleblowing officers is working, this whistleblowing officer will not receive your report and it will only be sent to the other whistleblowing officers, in order to avoid any conflict of interest.



One of the whistleblowing officers will send you a **confirmation of receipt** of the report within 7 days.

If your report is inadmissible (e.g. because it relates to a matter that cannot be reported via the whistleblowing process), the whistleblowing officers will inform you, close the case and direct you to another appropriate channel.

We commit to ensuring that **our whistleblowing officers will thoroughly, objectively and diligently investigate each admissible report**.

The whistleblowing officers may involve internal and/or external experts to assist in the investigation and/or follow-up of the report (referred to herein as “**appointed case handlers**”).

You may be requested to provide clarification or additional information.

You will receive a **unique code** to log into the tool at a later point in time, check the feedback from the whistleblowing officers and provide further information.

- If you submit the report via the online tool, the tool generates this unique code. This also applies if you choose to report anonymously.
- If you submit the report by calling a whistleblowing officer, (s)he will create a case in the tool and provide you with the unique code.

The whistleblowing officers will keep appropriate records of all investigative actions. In all cases where the whistleblowing officers or appointed case handlers prepare minutes or transcripts of an oral conversation, the person being interviewed has a right to verify, rectify and agree to the minutes/transcripts.

The whistleblowing officers will respect the reported person's right of defence.

Within 3 months of the acknowledgement of receipt, a whistleblowing officer will give you **feedback on how your report has been followed-up**.

Depending on the outcome of the investigation, Euroports will take **appropriate follow-up actions**. This may include, for example, disciplinary sanctioning, termination of the collaboration, informing the police or other legal action.



## Confidentiality

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**All reports are treated confidentially.**

This confidentiality commitment relates to:

- your identity;
- the identity of the reported person and other persons involved; and
- the reported concerns.

Only the whistleblowing officers have **access** to your report and the case data (which are stored in the online tool). The whistleblowing officers only have access to those cases for which they are appointed. The whistleblowing officers can give access to appointed case handlers on a need-to-know basis.

The whistleblowing officers are instructed and trained to keep the **identity** of the whistleblower, reported person and other persons involved confidential, except:

- with the consent of the individual concerned; or
- when we are legally obliged to disclose the identity in the context of investigations by an authority or judicial proceedings (in which case the individual concerned will be informed in advance, unless this would jeopardise the investigation/proceeding).

The whistleblowing officers are instructed and trained to keep the **reported concerns** confidential and only share them:

- on a need-to-know basis, with appointed case handlers;
- with our management (during the investigation, only limited data is shared); or
- with authorities or other external parties, when legally required or when appropriate in view of the public interest.

Any disclosure as referred to above shall be limited to those data that are relevant for the specific purpose of the disclosure.

Appointed case handlers are bound by the same confidentiality obligations as the whistleblowing officers.

If the investigation concludes that misconduct has occurred, the details of the established misconduct and the identity of the persons responsible for the misconduct will be disclosed to Euroports' management and relevant departments (e.g. HR) and, where appropriate, to authorities or other relevant external parties.



## Security

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Utmost efforts are made to secure the data related to the report. The provider of our online tool has a strong focus on security, confidentiality and GDPR-compliance.

Our online tool provider applies appropriate technological security measures, including firewalls, anti-virus software and **End-to-End Encryption**. All case-related data are encrypted before being stored in the tool provider's database. Only we receive the decryption keys.

The provider of the tool is ISO 27001 certified and is subject to regular audits and penetration tests.



## Protection against retaliation

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**Euroports does not tolerate any form of retaliation** against whistleblowers or individuals involved in the investigation or follow-up of a report.

Retaliation includes any form of intimidation, threats, harassment, punishment, or other adverse treatment. For example, if you are a staff member, you will not be subject to a dismissal, disciplinary sanction or other adverse treatment because of the fact that you submitted a whistleblowing report in good faith.

Moreover, in certain circumstances, you may benefit from specific legal protection against retaliation provided for under the national whistleblowing legislation.

- Such legal protection generally also applies to persons who assist the whistleblower in the reporting process and persons who are connected to the whistleblower (e.g. relatives).
- The country-specific sections in annex A to this policy provide further information on the conditions to benefit from such legal protection.

We will take disciplinary or other action against individuals who act in bad faith and **knowingly make a false report**. In such case, other legal sanctions (civil or criminal) may apply, depending on national law.

Such action will not be taken against individuals who, acting in good faith, report suspicions, where the investigation concludes that no illegal or unethical conduct occurred.



## Protection of personal data

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The processing of personal data in the context of this whistleblowing policy will take place in accordance with the requirements of the European General Data Protection Regulation (GDPR) and any local data protection legislation (as applicable).

The **privacy statement in annex B** to this policy provides further information in this respect.





## Reporting externally

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You are strongly encouraged to report illegal or unethical conduct *internally*, either in an informal manner or via our internal whistleblowing channel. This allows us to investigate the matter efficiently and to take immediate appropriate action.

Within the EU, you are, in some cases, also entitled to report breaches *externally* to competent authorities.

- The country-specific sections in annex A to this policy contain further information on external reporting to national competent authorities.
- In addition, some bodies, offices and agencies of the European Union are competent to receive external whistleblowing reports.<sup>1</sup>



## Amending this policy

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This policy, including its annexes, will be reviewed and updated periodically to ensure its effectiveness and alignment with legal, technical and ethical standards.



## Questions regarding this policy

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If you have any questions about this policy, you can **contact the whistleblowing officers appointed for your country** (listed in the relevant country annex to this policy and on our website and intranet).

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<sup>1</sup> This includes, for example, [the European Commission](#), the European Anti-Fraud Office ([OLAF](#)), the European Maritime Safety Agency ([EMSA](#)), the European Aviation Safety Agency ([EASA](#)), the European Security and Markets Authority ([ESMA](#)), the European Medicines Agency ([EMA](#)) and [the European Public Prosecutor's Office](#).

## A. Country-specific annexes



### BELGIUM

<p>Whistleblowing officers</p>	<p>The whistleblowing officers appointed by the Belgian group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- depending on which legal entity the report relates to:             <ul style="list-style-type: none"> <li>- the Local HR Manager for the Flemish terminals;</li> <li>- the Local HR Manager for Belgium Inland Terminals; or</li> <li>- the MPL Global HR Manager for Manuport Logistics entities.</li> </ul> </li> </ul>
<p>National legislation on whistleblowing</p>	<p>The Belgian legislation implementing EU Directive 2019/1937 is the Act of 28 November 2022 regarding the protection of whistleblowers in the private sector (“the <b>Belgian Whistleblowing Act</b>”).</p> <p>You can consult the text of this act on the following website: <a href="http://www.ejustice.just.fgov.be/eli/wet/2022/11/28/2022042980/justeL">http://www.ejustice.just.fgov.be/eli/wet/2022/11/28/2022042980/justeL</a>.</p>
<p>Legal protection</p>	<p>You can find the conditions to benefit from legal protection against retaliation in articles 8 and 9 of the Belgian Whistleblowing Act.</p>
<p>External reporting</p>	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Belgian Whistleblowing Act. You can find this list in article 2 of the Belgian Whistleblowing Act.</p> <p>You can find information on which Belgian authorities are competent to receive external whistleblowing reports and how to file such report on:</p> <ul style="list-style-type: none"> <li>- the website of the Federal Institute for Human Rights: <a href="https://federaalinstituutmensenrechten.be/nl/de-klokkenluidersregeling-en-ondersteuning-van-klokkenluiders">https://federaalinstituutmensenrechten.be/nl/de-klokkenluidersregeling-en-ondersteuning-van-klokkenluiders</a>; and</li> <li>- the website of the Federal Ombudsman: <a href="https://www.federalombudsman.be/nl/centrum-integriteit/klokkenluiders">https://www.federalombudsman.be/nl/centrum-integriteit/klokkenluiders</a>.</li> </ul>



## BULGARIA

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Whistleblowing officers	<p>The whistleblowing officers appointed by the Bulgarian group entities are:</p> <ul style="list-style-type: none"> <li>- the Local HR Manager; and</li> <li>- the Local QHSE Manager.</li> </ul>
National legislation on whistleblowing	<p>The Bulgarian legislation implementing EU Directive 2019/1937 is “Закон за защита на лицата, подаващи сигнали или публично оповестяващи информация за нарушения” (“the <b>Bulgarian Whistleblowing Act</b>”).</p> <p>You can consult the text of this act on the following website: <a href="https://www.cdpd.bg/?p=element&amp;aid=1394">https://www.cdpd.bg/?p=element&amp;aid=1394</a>.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in article 6 of the Bulgarian Whistleblowing Act.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Bulgarian Whistleblowing Act. You can find this list in articles 1, 3 and 4 of the Bulgarian Whistleblowing Act.</p> <p>You can find information on which Bulgarian authorities are competent to receive external whistleblowing reports and how to file such report on the website of the Bulgarian Commission on Personal Data Protection (which is the competent regulator for whistleblowing): <a href="https://www.cdpd.bg/?p=sub_rubric&amp;aid=285">https://www.cdpd.bg/?p=sub_rubric&amp;aid=285</a></p>



## FINLAND

Whistleblowing officers	<p>The whistleblowing officers appointed by the Finnish group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the Local HR Manager.</li> </ul>
National legislation on whistleblowing	<p>The Finnish legislation implementing EU Directive 2019/1937 is “<i>Laki Euroopan unionin ja kansallisen oikeuden rikkomisesta ilmoittavien henkilöiden suojelusta (1171/2022)</i>” (“the Finnish Whistleblowing Act”).</p> <p>You can consult the text of this act on the following website: <a href="https://www.finlex.fi/fi/laki/alkup/2022/20221171">https://www.finlex.fi/fi/laki/alkup/2022/20221171</a>.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in Chapter 2, Sections 6, 7, 8 and 9 of the Finnish Whistleblowing Act.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when:</p> <ul style="list-style-type: none"> <li>- the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Belgian Whistleblowing Act. You can find this list in Chapter 1, Section 2 of the Finnish Whistleblowing Act; and</li> <li>- in addition, one of the following exceptions applies:             <ol style="list-style-type: none"> <li>a. you do not have access to our internal whistleblowing channel;</li> <li>b. you reported your concern via our internal channel and we have not followed up on the report;</li> <li>c. you have reasonable grounds to assume that we cannot effectively intervene with respect to the breach; or</li> <li>d. you would be under a threat of retaliation if the report would be made internally.</li> </ol> </li> </ul> <p>You can find information on which Finnish authorities are competent to receive external whistleblowing reports and how to file such report on the website of the Chancellor of Justice: <a href="https://oikeuskansleri.fi/en/centralised-external-reporting-channel">https://oikeuskansleri.fi/en/centralised-external-reporting-channel</a>.</p>



## FRANCE

Whistleblowing officers	<p>The whistleblowing officers appointed by the French <u>Manuport Logistics group entities</u> are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the MPL Global HR Manager.</li> </ul> <p>The whistleblowing officers appointed by the <u>other French Euroports group entities</u> are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal); and</li> <li>- the Chief Human Resources Officer (Group HR).</li> </ul>
National legislation on whistleblowing	<p>The French legislation implementing EU Directive 2019/1937 consists of the following pieces of legislation:</p> <ul style="list-style-type: none"> <li>- Articles 6 up to 16 of “<i>Loi n° 2016-1691 du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et la modernisation de la vie économique</i>” (the “Loi Sapin II”) (<a href="https://www.legifrance.gouv.fr/loda/id/JORFTEXT000033558528">https://www.legifrance.gouv.fr/loda/id/JORFTEXT000033558528</a>);</li> <li>- “<i>Loi n° 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d’alerte</i>” (<a href="https://www.legifrance.gouv.fr/loda/id/JORFTEXT000045388745">https://www.legifrance.gouv.fr/loda/id/JORFTEXT000045388745</a>);</li> <li>- “<i>Décret n° 2022-1284 du 3 octobre 2022 relatif aux procédures de recueil et de traitement des signalements émis par les lanceurs d’alerte et fixant la liste des autorités externes instituées par la loi n° 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d’alerte</i>” (<a href="https://www.legifrance.gouv.fr/loda/id/JORFTEXT000046357368">https://www.legifrance.gouv.fr/loda/id/JORFTEXT000046357368</a>);</li> <li>- Articles L. 1121-2 and L. 1132-3-3 of the “<i>Code du travail</i>” (<a href="https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045389811">https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045389811</a> and <a href="https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045391816">https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045391816</a>);</li> <li>- Articles 122-9 and 225-1 of the “<i>Code pénal</i>” (<a href="https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045391764">https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045391764</a> and <a href="https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045391831">https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045391831</a>).</li> </ul>

	<p>(altogether referred to as “the <b>French Whistleblowing Act</b>”).</p> <p>You can consult the text of this legislation on the abovementioned websites.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in articles L. 1121-2 and L. 1132-3-3 of the “<i>Code du travail</i>” and in articles 122-9 and 225-1 of the “<i>Code pénal</i>”.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the French Whistleblowing Act. You can find this list in article 6 of the “<i>Loi Sapin II</i>”.</p> <p>You can find information on which French authorities are competent to receive external whistleblowing reports and how to file such report on the following government website: <a href="https://www.service-public.fr/particuliers/vosdroits/F32031">https://www.service-public.fr/particuliers/vosdroits/F32031</a>.</p>



## GERMANY

<p>Whistleblowing officers</p>	<p>The whistleblowing officers appointed by the German <u>Manuport Logistics group entities</u> are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the MPL Global HR Manager.</li> </ul> <p>The whistleblowing officers appointed by the <u>other German Euroports group entities</u> are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the Local HR Manager.</li> </ul>
<p>National legislation on whistleblowing</p>	<p>The German legislation implementing EU Directive 2019/1937 is “<i>Gesetz für einen besseren Schutz hinweisgebender Personen (Hinweisgeberschutzgesetz - HinSchG)</i>” (“the <b>German Whistleblowing Act</b>”).</p> <p>You can consult the text of this act on the following website: <a href="https://www.gesetze-im-internet.de/hinschg/">https://www.gesetze-im-internet.de/hinschg/</a> .</p>
<p>Legal protection</p>	<p>You can find the conditions to benefit from legal protection against retaliation in §33 of the German Whistleblowing Act.</p>
<p>External reporting</p>	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the German Whistleblowing Act. You can find this list in §2 of the German Whistleblowing Act.</p> <p>You can find information on which German authorities are competent to receive external whistleblowing reports and how to file such report on the following websites (each with respect to their external reporting channel):</p> <ul style="list-style-type: none"> <li>- the website of the Federal Office of Justice: <a href="https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html">https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html</a>;</li> <li>- the website of the Federal Financial Supervisory Authority: <a href="https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html">https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html</a>; and</li> <li>- the website of the Federal Cartel Office:</li> </ul>

[https://www.bundeskartellamt.de/DE/Kartellverbot/Hinweise\\_auf\\_Verstoesse/Hinweise\\_node.html](https://www.bundeskartellamt.de/DE/Kartellverbot/Hinweise_auf_Verstoesse/Hinweise_node.html).





## GREECE

Whistleblowing officers	<p>The whistleblowing officers appointed by the Greek Manuport Logistics group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the MPL Global HR Manager.</li> </ul>
National legislation on whistleblowing	<p>The Greek legislation implementing EU Directive 2019/1937 is “<i>Law 4990/2022</i>” (“the <b>Greek Whistleblowing Act</b>”).</p> <p>You can consult the text of this act on the following website: <a href="https://www.dskil.gr/images/pdf/FEK-2022-Tefxos-A-00210-downloaded--14_11_2022.pdf">https://www.dskil.gr/images/pdf/FEK-2022-Tefxos-A-00210-downloaded--14_11_2022.pdf</a>.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in article 7 of the Greek Whistleblowing Act.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when:</p> <ul style="list-style-type: none"> <li>- the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Greek Whistleblowing Act. You can find this list in articles 4 and 5 of the Greek Whistleblowing Act; and</li> <li>- in addition, one of the following exceptions applies:             <ol style="list-style-type: none"> <li>a. You believe that the report cannot be addressed effectively via the internal channel; or</li> <li>b. You believe that there is a risk of retaliation.</li> </ol> </li> </ul> <p>You can find information on which Greek authorities are competent to receive external whistleblowing reports and how to file such report on the following website of the National Transparency Authority: <a href="https://extwhistle.aead.gr/#/">https://extwhistle.aead.gr/#/</a>.</p>



## ITALY

Whistleblowing officers	<p>The whistleblowing officers appointed by the Italian group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the Local HR Manager (MED HR Manager).</li> </ul>
National legislation on whistleblowing	<p>The Italian legislation implementing EU Directive 2019/1937 is “<i>D.Lgs. n. 24/2023</i>” (“the <b>Italian Whistleblowing Act</b>”).</p> <p>You can consult the text of this act on the following website:  <a href="https://www.gazzettaufficiale.it/eli/id/2023/03/15/23G00032/sg">https://www.gazzettaufficiale.it/eli/id/2023/03/15/23G00032/sg</a>.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in article 16 of the Italian Whistleblowing Act.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when:</p> <ul style="list-style-type: none"> <li>- the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Italian Whistleblowing Act. You can find this list in article 2 (in combination with articles 1 and 3) of the Italian Whistleblowing Act; and</li> <li>- in addition, one of the following exceptions applies:             <ol style="list-style-type: none"> <li>a. No internal reporting channel is available (or it is available, but it is not compliant with the Italian Whistleblowing Act);</li> <li>b. You submitted an internal report, but it was not followed up on;</li> <li>c. You have reasonable grounds to believe that an internal report would not be effectively followed up on or give rise to a risk of retaliation; or</li> <li>d. You have reasonable grounds to believe that the violation may present an imminent or clear danger to the public interest.</li> </ol> </li> </ul> <p>You can find information on which Italian authorities are competent to receive external whistleblowing reports and how to file such report on the website of ANAC, the National Anti-Corruption Authority:  <a href="https://www.anticorruzione.it/-/whistleblowing">https://www.anticorruzione.it/-/whistleblowing</a>.</p>



## LUXEMBOURG

<p>Whistleblowing officers</p>	<p>The whistleblowing officers appointed by the Luxembourg Euroports group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal); and</li> <li>- the Chief Human Resources Officer (Group HR).</li> </ul>
<p>National legislation on whistleblowing</p>	<p>The Luxembourg legislation implementing EU Directive 2019/1937 is “<i>Loi du 16 mai 2023 portant transposition de la directive (UE) 2019/1937 du Parlement Européen et du Conseil du 23 octobre 2019 sur la protection des personnes qui signalent des violations du droit de l’Union</i>” (“the Luxembourg Whistleblowing Act”).</p> <p>You can consult the text of this legislation on the following website: <a href="https://legilux.public.lu/eli/etat/leg/loi/2023/05/16/a232/jo">https://legilux.public.lu/eli/etat/leg/loi/2023/05/16/a232/jo</a>.</p>
<p>Legal protection</p>	<p>You can find the conditions to benefit from legal protection against retaliation in articles 2 and 17 of the Luxembourg Whistleblowing Act.</p>
<p>External reporting</p>	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Luxembourg Whistleblowing Act. You can find this list in article 1 of the Luxembourg Whistleblowing Act.</p> <p>The Luxembourg Whistleblowing Act expressly encourages whistleblowers to prioritise the internal company channel.</p> <p>You can find information on which Luxembourg authorities are competent to receive external whistleblowing reports and how to file such report on the following government website: <a href="https://gouvernement.lu/fr/dossiers.gouv_mj%2Bfr%2Bdossiers%2B2023%2Bblanceurs-d-alerte.html">https://gouvernement.lu/fr/dossiers.gouv_mj%2Bfr%2Bdossiers%2B2023%2Bblanceurs-d-alerte.html</a>.</p>



## PORTUGAL

<p>Whistleblowing officers</p>	<p>The whistleblowing officers appointed by the Portuguese (Manuport Logistics) group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the MPL Global HR Manager.</li> </ul>
<p>National legislation on whistleblowing</p>	<p>The Portuguese legislation implementing EU Directive 2019/1937 is “<i>Lei n.º 93/2021, de 20 de Dezembro, que estabelece o regime geral de proteção de denunciadores de infrações, transpondo a Diretiva (UE) 2019/1937 do Parlamento Europeu e do Conselho, de 23 de outubro de 2019, relativa à proteção das pessoas que denunciam violações do direito da União</i>” (“the <b>Portuguese Whistleblowing Act</b>”).</p> <p>You can consult the text of this act on the following website: <a href="https://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=3544&amp;tab=leis&amp;ficha=1&amp;pagina=1&amp;so_miolo=S">https://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=3544&amp;tab=leis&amp;ficha=1&amp;pagina=1&amp;so_miolo=S</a>.</p>
<p>Legal protection</p>	<p>You can find the conditions to benefit from legal protection against retaliation in article 6 of the Portuguese Whistleblowing Act.</p>
<p>External reporting</p>	<p>You are able to report your concerns externally to competent authorities when:</p> <ul style="list-style-type: none"> <li>- the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Portuguese Whistleblowing Act. You can find this list in article 2 of the Portuguese Whistleblowing Act; and</li> <li>- in addition, no internal reporting channel is available.</li> </ul> <p>Portuguese authorities competent to receive such external whistleblowing reports include:</p> <ul style="list-style-type: none"> <li>- the Public Prosecutor's Office;</li> <li>- the criminal police;</li> <li>- the Bank of Portugal;</li> <li>- any other independent administrative authorities;</li> <li>- public institutes;</li> <li>- general inspection services and similar bodies and other central services of the state's direct administration with administrative autonomy;</li> <li>- local authorities; and</li> <li>- public associations.</li> </ul>



## SPAIN

Whistleblowing officers	<p>The whistleblowing officers appointed by the Spanish <u>Manuport Logistics group entities</u> are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the MPL Global HR Manager.</li> </ul> <p>The whistleblowing officers appointed by the <u>other Spanish Euroports group entities</u> are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the Local HR Manager (MED HR Manager).</li> </ul>
National legislation on whistleblowing	<p>The Spanish legislation implementing EU Directive 2019/1937 is “<i>Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción</i>” (“the Spanish Whistleblowing Act”).</p> <p>You can consult the text of this act on the following website: <a href="https://www.boe.es/buscar/act.php?lang=es&amp;id=BOE-A-2023-4513&amp;tn=1&amp;p=">https://www.boe.es/buscar/act.php?lang=es&amp;id=BOE-A-2023-4513&amp;tn=1&amp;p=</a>.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in article 35 of the Spanish Whistleblowing Act.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Spanish Whistleblowing Act. You can find this list in article 2 of the Spanish Whistleblowing Act.</p> <p>The Spanish Whistleblowing Act expressly encourages whistleblowers to prioritise the internal company channel.</p> <p>You can find information on which Spanish authorities are competent to receive external whistleblowing reports and how to file such report on the following websites:</p> <ul style="list-style-type: none"> <li>- the website of the Independent Authority for Whistleblower Protection (<i>Autoridad Independiente de Protección del Informante, A.A.I.</i>) (once it has been set up);</li> </ul>

- the website of the Anti-Fraud and Anti-Corruption Office of the Autonomous Community Andalusia: <https://antifraudeandalucia.es>;
- the website of the Anti-Fraud Office of the Autonomous Community Cataluña: <https://antifrau.cat/en/>;
- the website of the Anti-Fraud Office of the Autonomous Community Valencia: <https://antifraucv.es>.



## THE NETHERLANDS

Whistleblowing officers	<p>The whistleblowing officers appointed by the Dutch (Manuport Logistics) group entities are:</p> <ul style="list-style-type: none"> <li>- the Chief Corporate and Development Officer (Group Legal);</li> <li>- the Chief Human Resources Officer (Group HR); and</li> <li>- the MPL Global HR Manager.</li> </ul>
National legislation on whistleblowing	<p>The Dutch legislation implementing EU Directive 2019/1937 is “<i>Wet Bescherming Klokkeluiders (Wbk)</i>” (“the Dutch Whistleblowing Act”).</p> <p>You can consult the text of this act on the following website: <a href="https://wetten.overheid.nl/BWBR0037852/2023-02-18">https://wetten.overheid.nl/BWBR0037852/2023-02-18</a>.</p>
Legal protection	<p>You can find the conditions to benefit from legal protection against retaliation in Chapter 2a of the Dutch Whistleblowing Act.</p>
External reporting	<p>You are able to report your concerns externally to competent authorities when the misconduct that you want to report relates to a breach of the legal matters that are specifically listed in the Dutch Whistleblowing Act. You can find this list in article 1 of the Dutch Whistleblowing Act.</p> <p>You can find information on which Dutch authorities are competent to receive external whistleblowing reports and how to file such report on the following website: <a href="https://www.wetbeschermingklokkeluiders.nl/wat-verandert-er/externe-meldkanalen">https://www.wetbeschermingklokkeluiders.nl/wat-verandert-er/externe-meldkanalen</a>.</p>



## CHINA

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### Whistleblowing officers

The whistleblowing officers appointed by the Chinese group entities are:

- the Chief Corporate and Development Officer (Group Legal);
- the Chief Human Resources Officer (Group HR); and
- the Local HR Manager.



## OTHER NON-EU COUNTRIES (MPL)

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### Whistleblowing officers

The whistleblowing officers appointed by the Manuport Logistics group entities in countries outside the European Union are:

- the Chief Corporate and Development Officer (Group Legal);
- the Chief Human Resources Officer (Group HR); and
- the MPL Global HR Manager.



## B. Privacy statement

This privacy statement explains how and why personal data are processed in the context of Euroports' Whistleblowing Policy, how we protect them, how long we keep them and who you can contact.

For purposes of this Whistleblowing Privacy Statement, “you” refers to each of the data subjects described below.

All processing is done in compliance with the European General Data Protection Regulation (GDPR) and local data protection regulations (as applicable).

### *Purpose of processing*

The whistleblowing procedure aims at providing a channel through which concerns about breaches of (national, EU or international) law within the Euroports organisation and breaches of Euroports' code of conduct or other policies can be reported, so that they can be investigated, and appropriate action can be taken.

The ultimate purpose is to promote a speak-up company culture in which misconduct is not tolerated and to increase transparency and integrity within the Euroports group. Providing for a safe, confidential and anonymous whistleblowing reporting channel is considered as an essential element of an effective integrity and compliance policy.

### *Scope of processing*

All entities of the global Euroports group act as data controllers in the processing of personal data in the context of their whistleblowing policy, in line with the intra-group arrangements.

The data subjects are:

- the whistleblowers mentioned in the section “*Scope of application*” of our Whistleblowing Policy;
- the individuals who are mentioned in a whistleblowing report or the related investigation; and
- the witnesses and other individuals who provide information in the context of the investigation.

The reported person is informed about the report as soon as reasonably possible. The timing of this information will be delayed and/or its content will be limited if there is a risk that the investigation or gathering of proof may be hindered or that the identity of the whistleblower may be disclosed.

No automated decision-making is applied, meaning that we do not base any decisions about you solely on the automated processing of your personal data.

### *Data being processed*

The personal data being processed are gathered from the whistleblower, the reported person, witnesses and other individuals who may be involved in the case or who may be able to clarify the matter.

The data may include the following:

- identification data;
- the reported concerns;
- information obtained in the context of the investigation;

- information on the outcome of the investigation and on any follow-up actions taken.

The data may potentially include:

- judicial or criminal data (e.g. in case of concerns that may constitute a criminal offence);
- sensitive personal data (i.e. special categories of personal data revealing trade-union membership, racial or ethnic origin, political opinions, religious or philosophical beliefs, ...). This will in principle not be the case, as Euroports does not intend to process such data and the tool does not include questions asking for such data. However, given the wide range of matters to which the whistleblowing report may relate, it is possible that the report includes said data.

### ***Legal grounds for processing***

The processing is necessary:

- for compliance with a legal obligation to which Euroports is subject (based on EU Directive 2019/1937 on the protection of persons who report breaches of Union law and the national implementing legislation mentioned in the country annexes to our Whistleblowing Policy); and
- for the purposes of the legitimate interests pursued by Euroports (as explained above under “*Purpose of processing*”).

### ***Recipients of data and processors***

Access to the personal data is restricted as set out in the section “*Confidentiality*” of our Whistleblowing Policy.

The provider of our online whistleblowing tool (Whistleblower Software ApS) is a processor.

### ***Protection of data***

The personal data are protected as set out in the sections “*Security*” and “*Confidentiality*” of our Whistleblowing Policy.

### ***Transfer of data***

In principle, there will be no transfer of personal data relating to persons in the European Economic Area (“*EEA*”) to recipients outside the EEA. The servers of our online tool provider are located in the European Union.

However, in certain circumstances, data may be shared with recipients located in non-EEA countries on a strict need-to-know basis (e.g. if the report concerns alleged misconduct by individuals located in both EEA and non-EEA group entities). If, in such case, there is no adequacy decision with respect to the non-EEA country concerned, Euroports ensures the application of appropriate safeguards, such as the European Commission model clauses.

### ***Data retention***

Your personal data will be kept for no longer than necessary and proportionate, taking into consideration the following factors:

- any legal requirements regarding data retention;
- the type of report (inadmissible, no established misconduct, established misconduct);
- the period of limitation during which Euroports' investigation and follow-up actions may be challenged; and

- any link to disciplinary or legal proceedings, criminal investigations or other investigations or procedures conducted by an authority.

### *Contact person & data subject rights*

If you have any questions about the processing of your personal data, you can contact the whistleblowing officers appointed for your country (listed in the relevant country annex to our Whistleblowing Policy and on our intranet and website (under the section 'ESG' > 'Whistleblowing')).

Your data subject rights are explained in our general GDPR Privacy Statement, which can be found on our [website](#).

Requests to exercise your data subject rights under this Whistleblowing Privacy Statement should (in deviation from section 5.2 of our general GDPR Privacy Statement) be sent to [whistleblowing@euroports.com](mailto:whistleblowing@euroports.com). This email account is managed by the group whistleblowing officers (Group Legal and Group HR) in order to ensure confidentiality. Whistleblowers can also choose to send a request regarding their data subject rights by logging into the online tool via their unique code.

Document name:	Whistleblowing policy
Owner:	Group HR
Recipients:	All Euroports group staff members (including employees and (project) consultants) + all other persons with a current, past or prospective professional relationship with Euroports (customers, suppliers, job applicants, former staff members, ...)
Version:	Version 1
Date:	20-12-2023
Approval:	Group Executive Committee
File name:	ENG_Whistleblowing policy Group
Country level implementation required?	<input checked="" type="checkbox"/> Yes, according to the <input checked="" type="checkbox"/> Policy; <input type="checkbox"/> Work Instruction <input type="checkbox"/> No
Terminal level implementation required?	<input checked="" type="checkbox"/> Yes, according to the <input checked="" type="checkbox"/> Policy; <input type="checkbox"/> Work Instruction <input type="checkbox"/> No
Country level translation required?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
To be implemented by	Country HR Manager
<i>This policy is public (for internal and external use) and may be disclosed to third parties.</i>	