

WHISTLEBLOWER

WHISTLEBLOWER POLICY FOR SCAN GLOBAL LOGISTICS

Version 2.0

» OBJECTIVE

The objective of this Whistleblower Policy is to set the framework for the whistleblower system of Scan Global Logistics which, in addition to Scan Global Logistics' usual reporting channels, can be used to raise any serious concerns, including any suspicion or knowledge of illegal, unethical or irregular conduct.

» WHO CAN RAISE CONCERNS?

The whistleblower system of Scan Global Logistics can be used by the employees of Scan Global Logistics. The whistleblower system can also be used by the directors, customers, suppliers and other business associates of Scan Global Logistics.

» HOW ARE CONCERNS RAISED?

Concerns are raised by accessing the whistleblower system on the website of Scan Global Logistics (www.scangl.com). The whistleblower system will inform and guide the whistleblower about matters of importance to the assessment of the concern raised.

» WHAT CONCERNS CAN BE RAISED?

You can use the whistleblower system to raise all serious concerns which fall within the scope of the current regulation regarding protection of whistleblowers. It could be suspicion or knowledge of any illegal, unethical or irregular conduct, including matters regarding bribery and corruption, abuse of funds, theft, deceit, embezzlement, fraud and other white-collar crime as well as any personal data security violation, serious environmental damage, conflicts of interest, sexual harassment or other gross harassment as well as other gross or repeated breaches of law or Scan Global Logistics' internal policies, including Scan Global Logistics' Code of Conduct.

We will specifically assess in each case whether the concern is within the scope of the system. The concern will be within the scope of the system if it is within the scope of the current regulation regarding protection of whistleblowers.

If you are an employee, we note that dissatisfaction with your employment such as salary and management style and other contractual terms and conditions are not to be reported to the whistleblower system. Instead, such matters are to be addressed through the usual channels to your line manager or HR.

Concerns must be raised in good faith. In particular, it means that the system may not be used to raise any concerns containing information that the whistleblower knows is wrong.

»» HANDLING CONCERNS RAISED

The law firm Poul Schmith will screen every concern raised through the whistleblower system.

The whistleblower will receive confirmation of the receipt of the concern as soon as possible and no later than 7 days.

During the screening the law firm Poul Schmith will perform an assessment of the concern. After the assessment of the concern the law firm Poul Schmith will deliver the concern to the Global VP, People, Leadership and Culture and the Global General Counsel at Scan Global Logistics. The concern will hereafter be subject of an investigation. The extend of the investigation will depend on the specific circumstances of the concern. The further investigation will as a starting point be carried out by Scan Global Logistics' whistleblower entity.

If the initial screening shows that the concern is not covered by the scope of Scan Global Logistics' system, the concern will not be processed further in the system, and the whistleblower will be informed accordingly.

The whistleblower will receive feedback on the status of the concern within 3 months, including the type of follow-up that has been made, if any.

»» ANONYMITY AND PROTECTION OF THE WHISTLEBLOWER

The whistleblower may decide whether to raise the concern anonymously or give his/her personal contact details.

If the whistleblower decides to raise the concern anonymously, neither Scan Global Logistics nor a third party will generally process the whistleblower's personal data. If, when raising the concern, the whistleblower provides data that make Scan Global

Logistics able to identify the whistleblower, Scan Global Logistics will, however, be entitled to process such data. This is the case even if the whistleblower has raised the concern anonymously.

If the whistleblower raises the concern anonymously, the whistleblower will have the option to decide whether he/she wants to be available for any further investigation by setting up a secure and anonymous mailbox through which Scan Global Logistics can contact the whistleblower. We recommend that the whistleblower sets up a mailbox as it can be difficult for Scan Global Logistics to conduct an investigation without any further information from the whistleblower.

If the whistleblower decides to reveal his/her identity when raising a concern, which falls within the scope of the system, Scan Global Logistics' whistleblower entity shall preserve the confidentiality of the whistleblower's identity in accordance with the applicable rules regarding protection of whistleblowers. Thus, the whistleblower's identity will only, in principle, be disclosed if the whistleblower explicitly consents to this. The whistleblower's identity can, however, also be disclosed to public authorities, such as the police or public prosecutor, if deemed necessary to respond to reported matters or for the purpose of ensuring the right to defence for the affected people.

A whistleblower, who reports serious matters which falls within the scope of the whistleblower system may not face retaliation of any kind as a result of the concern raised.

The reporting system does not log the IP address or the machine ID of the computer on which the concern is raised, and the system does not use any cookies. If the computer on which the concern is raised is owned by Scan Global Logistics or connected to the network of Scan Global Logistics, there is a risk that the IP address and/or the machine ID of the computer from which the concern is raised will be logged in the browser history and/or the log of Scan Global Logistics through the log that is made in the IT systems of Scan Global Logistics. The whistleblower may eliminate this risk by raising the concern from a computer that is not owned by Scan Global Logistics or connected to the network of Scan Global Logistics.

»» REPORTING TO EXTERNAL REPORTING CHANNELS

The whistleblower may also raise a concern through an external reporting channel – i.e. a whistleblower system which are established by a public authority. Thus, The Danish Data Protection Agency has, for example, established an external reporting channel, which supplements employers' duty to establish a whistleblower system.

Raising a concern through an external reporting channel is not conditioned by a preceding report to Scan Global Logistics' whistleblower system. However, we encourage you to raise your concern through Scan Global Logistics' whistleblower system so that Scan Global Logistics will be able to quickly and immediately follow up on the matter concerned.

» MANDATORY TRAINING

Training in this policy and other SGL Group policies are conducted for all new employees and every two years in the global mandatory e-learning platform 'Academy' together with tests which all employees must pass to finally receive a diploma for the training as documentation. All training is registered and stored digitally in the system.

REVIEW AND UPDATE OF POLICY

This Policy is reviewed and updated (if necessary) annually.

» CONTACT DETAILS

Questions about this policy may be addressed to Scan Global Logistics' Global VP, People, Leadership and Culture by telephone +45 25 70 77 07 or via e-mail bidam@scangl.com or Global General Counsel by telephone +45 26 72 78 94 or via e-mail hchr@scangl.com.