

## SPEAK UP POLICY

*This Policy is for those who cannot access this [link](#)*

### ECOM AGROINDUSTRIAL CORP. LTD GROUP

Last updated September 2024

#### 1. ABOUT THIS POLICY

- 1.1 ECOM Agroindustrial Corp. Limited ("**ECOM**") and the companies within its group (the "**ECOM Group**", "**we**", "**our**" or "**us**") have adopted this Speak Up Policy (the "**Policy**") to assist our business in operating with honesty and integrity.
- 1.2 The ECOM Group is committed to conducting our business with honesty and integrity and we expect all our employees, contractors, sub-contractors, suppliers, agents and other third party representatives to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.3 The purpose of this Policy is to establish mechanisms for resolving raising and investigating concerns in relation to any of our business activities, including employment, ethics and compliance practices; for example where you have a concern about (i) a danger or illegality that has a public interest aspect to it, or (ii) the conduct of an ECOM Group employee, contractor, agent or third party representative.
- 1.4 It is the ECOM Group's intent that users of this Policy be acknowledged and taken seriously, and that full records are maintained when issues are escalated and investigated pursuant to this Policy.
- 1.5 Any questions or concerns about this Policy should be referred to the ECOM Ethics Concerns Group.

#### 2. SCOPE OF THIS POLICY

- 2.1 This Policy covers the reporting of suspected wrongdoing, inappropriate behaviour and/or dangers relating to the activities of the ECOM Group. This may include:
  - 2.1.1 modern slavery;
  - 2.1.2 bribery, fraud or other criminal activity;
  - 2.1.3 facilitation of tax evasion;
  - 2.1.4 failure to comply with any legal, regulatory or professional obligation;
  - 2.1.5 miscarriages of justice;
  - 2.1.6 danger to health and safety, including matters concerning food and product safety;
  - 2.1.7 damage to the environment;
  - 2.1.8 financial mismanagement;
  - 2.1.9 conduct likely to damage ECOM's reputation or financial wellbeing;
  - 2.1.10 terms and conditions of employment;
  - 2.1.11 work relations;
  - 2.1.12 bullying or harassment;
  - 2.1.13 new working practices;

## SPEAK UP POLICY

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- 2.1.14 working environment;
  - 2.1.15 organisational change;
  - 2.1.16 discrimination, including discriminatory or unfair hiring practices;
  - 2.1.17 unauthorised disclosure of confidential information and/or trade secrets; or
  - 2.1.18 the deliberate concealment of any of the above matters.
- 2.2 The ECOM Group recognises, however, that false accusations of unlawful behaviour can be damaging to the ECOM Group. Thus, any attempt to abuse the trust of the Group by making false or malicious complaints in bad faith against the ECOM Group or any ECOM employee, contactor, agent or third party representative may lead to the termination of business relationships, and if appropriate, legal action.
- 3. RAISING A CONCERN**
- 3.1 To report any concerns within the scope set out in Section 2 above, you can (i) email the ECOM Speak Up line at [ecomsspeakup@ecomtrading.com](mailto:ecomsspeakup@ecomtrading.com); (ii) contact us through our secure, anonymous platform (contact details for which are found in Annex A of this Policy) (the “Platform”); or (iii) request a physical meeting by contacting the Ethics Concerns Group at [ecomsspeakup@ecomtrading.com](mailto:ecomsspeakup@ecomtrading.com).
- 3.2 The Platform is completely anonymous and we will never ask for your name, or any other information which may serve to identify you, through the Platform. However, you are free to identify yourself should you wish to do so.
- 3.3 We will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. During any investigation anything reported will only be shared on a “need to know” and confidential basis. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. Your consent will be sought where we consider disclosure of your identity is necessary.
- 3.4 ECOM will acknowledge receipt of a concern, however received, within seven days (unless requested not to do so).
- 3.5 An issue to be raised shall contain the following minimum information:
- 3.5.1 Name, address, and telephone number of the stakeholder on whose behalf the issue is being raised.
  - 3.5.2 Whether you want it to be raised anonymously. We note that opting to remain anonymous may make it more difficult or impossible for us to investigate your claim and to establish whether any allegations are credible if we cannot obtain further information from you. Consequently, if you opt to remain anonymous, it is important to provide as much information as possible in your report to allow a meaningful investigation
  - 3.5.3 The location in which the matter is alleged to have occurred.
  - 3.5.4 A complete statement of the matter raised and the facts upon which it is based.
  - 3.5.5 The names of any witnesses who can provide supportive or related information.

## SPEAK UP POLICY

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- 3.6 In some situations, we may ask you to provide further information.
- 3.7 We are required to keep records of reports received. We may create a transcript or written record of any reports made orally or during a meeting. You will be given the opportunity to check and agree such a transcript or written record. Reports will be stored for no longer than is necessary and in compliance with our data protection obligations.
- 3.8 We will seek to provide you with feedback on your report as soon as possible, and in any events within three months of acknowledgement of your report.

### 4. EXTERNAL DISCLOSURES

- 4.1 The aim of this Policy is to provide a mechanism for reporting, investigating and remedying concerns for external parties who acquire information through their work-related activities with the ECOM Group.
- 4.2 **ECOM strongly believes that this mechanism represents the best way to report concerns and, in most cases, you should not find it necessary to alert any external parties.**
- 4.3 There may be some legally recognised circumstances where it may be appropriate for you to report your concerns to an external body, such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. A list of external reporting channels is available upon request from the Ethics Concerns Group.

### 5. PROTECTION AND SUPPORT

- 5.1 We aim to encourage openness and will support stakeholders who raise genuine concerns under this Policy, even if they turn out to be mistaken, and such reports will not affect the discloser's relationship with the ECOM Group.
- 5.2 **ECOM does not tolerate retaliation against any person who raises any concern under this Policy. Reporters and those who assist or support them (in a work-related context) in making a report under this Policy must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes, but is not limited to, early termination or cancellation of a contract for services, loss of business or income, financial penalties, blacklisting, business boycotting or reputational damage.**
- 5.3 If the issue persists after we have reported closure of the investigation, or if you feel that you have faced retaliation as a result of reporting a concern under this Policy, please contact the Ethics Concerns Group immediately.

### 6. CONTACTS

ECOM Speak Up line	E-mail: <a href="mailto:ecomspakeup@ecomtrading.com">ecomspakeup@ecomtrading.com</a>
ECOM Speak Up platform	See Annex A



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### ANNEX A: ECOM SPEAK UP PLATFORM CONTACT DETAILS AND ACCESS POINTS

Web: using the QR Code or at <https://ecom.speakup.report/en-GB/ecom/home>

App: can be downloaded from the [Google Play](#) and [iOS App store](#) by searching 'SpeakUp People Intouch'. You will need the company code 109897 or the QR code to make a report



Phone: by using the relevant local phone number below, quoting company code 109897

COUNTRY	LOCAL PHONE NUMBER
Australia	0061282846262
Belgium	080089326
Bermuda	18334222008
Brazil	00551147008838
British Virgin Islands	18334621356
Burkina Faso	0022625300982
Cameroon	00237657103112
Canada	0015143950496
Cayman Islands	0013457695580
China	108001523042 (via China Telecom) 108008522221 (via China United Network) 4001201842 (Country-wide)
Colombia	002250566770918
Costa Rica	002250566770918
Cote d'Ivoire	002250566770918
Ecuador	1800001432
El Salvador	0050322304752
Germany	08001818952
Ghana	00233596993553
Guatemala	0050223028459
Honduras	80027916139
India	0008000503159
Indonesia	00622180630074
Italy	800147694
Japan	0081366270734
Kenya	00254207650957
Korea	0082237005146
Mexico	00525547806198
Netherlands	0031107007503



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<b>COUNTRY</b>	<b>LOCAL PHONE NUMBER</b>
Nicaragua	0050575137610
Nigeria	07080601221
Papua New Guinea	000861322
Paraguay	0098004410266
Peru	080074535
Singapore	006564037051
Switzerland	0800005691
Tanzania	0800111020
Uganda	00256414238162
United Arab Emirates	80004440408
United Kingdom	08000224118
USA	0016692887154
Uruguay	000415985762
Vietnam	008419003271