

Speak up!

Whistleblower policy

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Introduction

NewCold is committed to being the market leader in modern automated cold storage and supply chain services. As leaders in our industry, we hold ourselves to the highest standard of professional behavior. There may however be situations where this standard is not lived up to. This policy explains what you should do if you suspect, see or experience wrongdoing and how you can safely express your concerns.

We encourage our employees, former employees, candidates, consultants, contractors, suppliers and their employees, and others with whom NewCold has a business relationship to speak up and to report in good faith suspected or actual wrongdoing or misconduct by or within NewCold.

We understand that it may not be easy to speak up. Speaking up and reporting your concerns helps us to detect possible misconduct, to take appropriate action and to prevent it in the future. We will take utmost care to protect your identity when you report and the confidentiality of such report. We will protect people who speak up from suffering adverse consequences.

1. Scope

This policy describes how you can report your concerns about suspected or actual criminal conduct, ethical conduct or other misconduct including a breach of (EU) law or internal rules by or within NewCold such as our Code of Conduct, or any act in which the public interest is at stake. Examples include fraud and theft, conflict of interest, corruption and bribery or harassment.

This policy and its reporting channels are not intended for personal complaints. Abuse of this policy and malicious reports with the aim of intentionally harming others will result in disciplinary or legal action against you.

2. How to report a concern

NewCold encourages people to report suspected or actual wrongdoing or misconduct. This can be done in various ways and anonymously. Please be aware that it might be more difficult to thoroughly assess a concern when it is reported anonymously. All reports will be treated confidentially. You can speak up to your manager, HR, your contact person, a member of (local) management or the integrity team.

2.1 Report via the SpeakUp reporting channel

We recognize that it is not always easy to talk to a manager or direct contact person about your concerns. If that is not possible, or you do not feel comfortable doing so, we invite you to report your concern to the integrity team via the SpeakUp reporting channel. This user-friendly reporting channel is accessible through a dedicated app for your phone or via a webpage. Both are operated by an independent service provider and available 24/7 in many languages. It

provides a secure and confidential reporting environment, where you can report your concerns anonymously if you prefer to do so.

You can report through written message or voice message in your own language. Any voice message will be translated before it is shared with the integrity team. They will not have access to your original voice message. Their response to your report and further communication will also go via the SpeakUp reporting channel, unless you request otherwise.

To facilitate such communication, you will be requested to create an account and to login when entering the website. In the app you will be asked to setup a 6-digit secure pin. This will keep your report and further communication about it confidential. Your account details will not be shared with the integrity team when filing a report.

Access NewCold's SpeakUp reporting channel here:

<https://newcold.speakup.report/raiseaconcern>

or via this QR code:



The SpeakUp app from People Intouch is available for iOS and Android in the App Store or Play Store. After setting up your secure 6-digit PIN you can connect to NewCold's SpeakUp reporting channel using this organization code: **112786**

2.2 Other ways to report

If you would like to report in person, please also reach out via the SpeakUp reporting channel or directly by email to integrity@newcold.com and a member of the Integrity team will contact you to schedule a meeting.

You can also send your concern by regular mail to the below address or to your local NewCold office. Please clearly address your regular mail to the integrity team and mark it confidential.

NewCold - Integrity team
Gravinnen van Nassauboulevard 105
4811 BN Breda
The Netherlands

2.3 Reporting outside the company

If you do not feel comfortable to raise your concerns within our company, it is possible to do so with the local competent authority in the country of your NewCold location. Whenever you are considering such significant step, we strongly recommend you to seek advice and not to do this alone. Above all, we encourage and invite you to speak up within our company, to allow us to support you and to address your concerns proactively.

2.4 Content of your report

You may report your concern anonymously and in the language of the relevant NewCold location. For us to investigate your concern and to respond properly, we ask you to provide as many details as possible, including what happened, when, where and who was involved. If you have written or visual evidence of the concern, please share that too.

3. What happens after you have reported your concern

You will receive confirmation of receipt from the integrity team within 7 business days after receipt of your concern. They will evaluate your report and determine the appropriate course of action, which can include that they will initiate an investigation. They may involve other people who may be more appropriate to handle your concern or redirect the concern to the appropriate local authority for review and investigation. This may include external forensic auditors or outside legal advisors. They will also determine whether a local external authority needs to be notified. If applicable, you will be informed.

If your concern is about a member of the integrity team, the Chief People & Culture Officer shall take over the tasks of the integrity team.

When you report your concern to your manager, HR, contact person or member of the (local) management team, he or she will duly and as soon as practically possible report your concern to the integrity team if needed. At your request, they will do so without disclosing your name or identity insofar possible. They will not conduct any investigation on their own and not share your concerns with anyone other than the integrity team.

You may be asked additional questions to support an investigation and will be given the opportunity to be heard. People who are a subject of the concern will also be given the chance to be heard. Your cooperation with any investigation when requested will help us to conduct a proper investigation.

The integrity team will conduct the investigation in an independent, fair manner and with respect to all parties involved, in line with applicable (local) laws and regulations.

Although investigating a report may take time, we understand the importance of dealing with concern in a timely matter. Within 3 months after the confirmation of receipt you will be informed of the status of the investigation and the next steps in response to your report.

The integrity team will keep a register of concerns reported. This register is kept confidentially and access is limited to the integrity team, insofar allowed by local law or regulation.

Outcome

The integrity team will inform you and other relevant people of the outcome of their investigation and (corrective) actions to be taken. To safeguard the confidentiality of a report and protect the people involved, information will only be disclosed on a strict need-to-know basis and will be anonymized where possible and needed.

Reprisal as a result of a report filed in good faith, investigation or actions taken following the outcome of an investigation will be taken seriously. Appropriate action will be taken to protect the people concerned and to discipline those responsible for said reprisal.

4. Safeguards

Confidentiality

We assure you that your report and the investigation will be treated with utmost care and confidentiality. Information will only be accessible and shared on a need-to-know basis. Everyone involved, including you as the reporting person, must keep their involvement, the concerns, report, investigation and outcome confidential.

There may be an exception to confidentiality in case NewCold is legally required by applicable law or regulation to disclose information regarding a concern. Examples are if an external local authority needs to be notified, to obey a court order, to comply with information requests from regulators or criminal investigations authorities such as the police. NewCold will not disclose the reporting person's identity unless legally required to do so. We will inform the reporting person upfront where possible.

No adverse consequences for reporters and participants

NewCold protects anyone who reports a valid concern in good faith and anyone who cooperates with or participates in an investigation or provides information. There shall be no adverse consequences or retaliation against you for doing so. Protection of retaliation for employees does not give them immunity in further investigations or judicial proceedings concerning the matter.

Privacy

For the purpose of a speak up procedure under this policy, we may process the following data unless a report is filed anonymously: name, position, email address, phone number or other contact details of the reporting person, the person(s) concerned and if applicable, other people involved. All data will be processed in accordance with NewCold's privacy policy and local privacy laws and regulations.

Should you have any questions regarding this policy, please reach out to:

integrity@newcold.com