



ECOM AGROINDUSTRIAL CORP. LTD GROUP ETHICS CONCERNS POLICY

1. PURPOSE OF THIS POLICY

ECOM Agroindustrial Corp. Limited ("**ECOM**") and the companies within its group (the "**ECOM Group**", "**we**" or "**us**") have adopted this Ethics Concerns Policy ("**policy**") to assist its business in operating with honesty and integrity. This policy is for use by external parties only; ECOM personnel are requested to refer to the Internal Ethics and Compliance Concerns Policy.

The ECOM Group is committed to conducting business with honesty and integrity and we expect all staff to maintain high standards. This Policy exists for any third party to raise awareness of any suspected wrongdoing.

The purpose of this policy is to establish a mechanism for resolving complaints and other potential grievances in relation to ethics and compliance practices; for example where you have a concern about a danger or illegality that has a public interest aspect to it or the conduct of an ECOM Group employee or anyone representing the ECOM Group.

Any questions about this policy or any concerns that the policy has not been followed should be referred to the ECOM Ethics Concerns Group (EthicsConcerns@ecomtrading.com).

2. WHAT IS COVERED?

This policy covers the reporting of suspected wrongdoing or dangers in relation to the activities of the ECOM Group. This includes (but is not limited to) modern slavery, bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. Issues of inappropriate behavior such as bullying or harassment or unfair treatment may also be reported in line with this policy.

3. HOW TO RAISE A CONCERN

Please contact the ECOM Ethics Concerns Group (EthicsConcerns@ecomtrading.com).

If you want to raise your concern confidentially, 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 basis.

The ECOM Ethics Concerns Group will acknowledge receipt of a concern (unless requested not to do so).

When raising an issue, try to provide the below minimum information as this will aid any investigation:

- Name, address and telephone number of the stakeholder on whose behalf the issue is being raised.
- Whether you want it to be raised confidentially (see above). If you want to raise your concern confidentially, we will make every reasonable effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.
- The location in which the matter is alleged to have occurred.
- A complete statement of the matter raised and the facts upon which it is based.
- The names of any witnesses who can provide supportive or related information.

In some situations we may ask you to provide further information.

The ECOM Ethics Concerns Group will advise as soon as any investigation is complete.



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4. PROTECTION AND SUPPORT

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 relationship with the ECOM Group.

The ECOM Group recognizes, however, that false accusations of unlawful behavior can be damaging to the ECOM Group. Therefore, any attempt to abuse the trust of the Group by making frivolous, false, or malicious complaints against anyone shall be deemed to be made in bad faith and may lead to the termination of business relationships.

If the issue persists after we have reported closure of the investigation or if you feel you have been retaliated against for reporting a concern, raise it with the Ethics Concerns Group immediately. ECOM has a no-retaliation policy and takes retaliation very seriously.

5. CONTACTS

ECOM Ethics Concerns Group

E-mail: EthicsConcerns@ecomtrading.com

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