



## ETHICS CONCERNS POLICY

*This Policy is for use by external parties only; ECOM Personnel should refer to the internal Ethics and Compliance Concerns Policy.*

### ECOM AGROINDUSTRIAL CORP. LTD GROUP

Last updated March 2021

#### 1. ABOUT THIS POLICY

- 1.1 ECOM Agroindustrial Corp. Limited ("**ECOM**") and the companies within its group (the "**ECOM Group**", "**we**" or "**us**") have adopted this Ethics Concerns Policy (the "**Policy**") to assist its 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 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, 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 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 bullying or harassment;
  - 2.1.11 unauthorised disclosure of confidential information and/or trade secrets; or
  - 2.1.12 the deliberate concealment of any of the above matters.

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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 ECOM Group or any ECOM employee, contactor, agent or third party representative may lead to the termination of business relationships.

### 3. RAISING A CONCERN

3.1 To report any concerns within the scope set out in Section 2 above, you should contact the Ethics Concerns Group (whose contact details are set out in Section 6 below). You can also contact us by telephone to raise a concern or request a physical meeting by contacting the Ethics Concerns Group.

3.2 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.

3.3 The Ethics Concerns Group will acknowledge receipt of a concern within seven days (unless requested not to do so).

3.4 An issue to be raised shall contain the following minimum information:

3.4.1 Name, address, and telephone number of the stakeholder on whose behalf the issue is being raised.

3.4.2 Whether you want it to be raised anonymously. Completely anonymous disclosures are difficult to investigate.

3.4.3 The location in which the matter is alleged to have occurred.

3.4.4 A complete statement of the matter raised and the facts upon which it is based.

3.4.5 The names of any witnesses who can provide supportive or related information.

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

3.6 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.

3.7 Within three months of acknowledgement of your report, you will be given feedback on the follow up of your report by the ECOM Ethics Concerns Group .

### 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.

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**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. Whistleblowers 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**

Ethics Concerns Group

E-mail: [EthicsConcerns@ecomtrading.com](mailto:EthicsConcerns@ecomtrading.com)

Telephone: +44 20 3214 2198