

# WHISTLE-BLOWER POLICY

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COMPANY Levi9  
WHISTLE-BLOWER POLICY LEVI9



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# 1. INTRODUCTION

Over the years, Levi9 has established a strong relationship with its employees, partners and customers. It is essential to maintain this relation to conserve employee satisfaction and to continue our business activities. To sustain this bond, we implemented a whistle-blower policy that describes how Levi Nine reacts and deals with any complaints or discontents. This Policy should be a guideline for people who want to rapport any criminal, unethical, malicious or border crossing incidents. Levi Nine considers the well-being, safety, and overall satisfaction of its employees, partners, and customers as its top priority; thus, Levi9 thinks having a policy in place is crucial to assure all stakeholders' safety and privacy in the business process of Levi Nine.

This policy is intended for people that are located in the Netherlands or Ukraine;

In case you are located in Romania, please use the internal regulations Romania as a guideline to continue the further process.

In case you are located in Serbia, please use the 'Obavestjenje o pravima zaposlenih koja su predvidjena zakonom o zastiti uzbunjivaca' as a guideline to continue the further process.

# 2. WHEN DO WE SPEAK OF A WORKRELATED ABUSE?

Levi9 encourages all stakeholders - involved in business activities- to report any conduct contrary to law, unethical or conduct that might damage the business continuation and reputation of Levi Nine or its clients. Reportable Conduct is anything that you have reasonable grounds to suspect, e.g.:

- Misconduct or an improper state of affairs or circumstances
- Any behaviour that is contrary to (local) laws or regulations
- Any action that is intentionally harming Levi Nine or its partners

Examples of Reportable Conduct include but are not limited to:

- Theft
- Fraud
- Threatening people
- Aggressive behaviour towards people
- Vandalism
- Creating security risks
- Failure in complying with/breaching legal or regulatory requirements
- (Sexual) inappropriate behaviour
- Threatening or violating any individual who wants to report any of these issues

Any issues related to personal conflicts are not part of these reportable conducts. For personal conflicts, please try to solve this with your local manager.

## 3. HOW TO INITIATE THE WHISTLEBLOWING PROCESS

### 3.1. When should I initiate the process?

Before initiating the whistleblowing process, you should be convinced that you have reasonable grounds to suspect any reportable conducts. If you have doubts about the seriousness of the issue or the abuse's demonstrability, please consider if you still want to continue the process or discuss the complaint with someone you trust to hear about his or her opinion. When there is no supporting information, the chances are present that the further process will not proceed smoothly. However, you as a Whistle-blower do not need to prove your allegations. Also, the disclosure will always qualify for protection even if the disclosure turns out to be incorrect. The processes described in the policy will secure your protection and safeguard you of reprisals.

### 3.2. How should I start the process?

When you are convinced that you have reasonable grounds to report an issue, contact your local reporting officer. He or she will help you construct a report. If you do not know who your local reporting officer is, please check the Policy's last page for the contact details. If your local reporting officer is part of the issue, please directly contact the central reporting officer (see last page for contact details) or a reporting officer you trust. In case you are not part of the Levi Nine organization, please contact the central reporting officer (see last page for contact details) When you cannot reach out to a reporting officer because of an emergency or a public interest disclosure, you have the legal right to consult an external party outside of Levi Nine.

### 3.3. What should be included in the Whistleblowing report?

You must include any information that is relevant to the issue in the report.

Reports should at least include:

- Date of the incident
- Data of the report
- Location
- Name of all parties involved
- The roles of involved parties
- Your relationship with the person(s) that are involved
- An extensive description of the issue
- Name of the reporting officer
- How you became aware of the issue
- Any witnesses/individuals who can support your report • Any information/sources that are supporting your report.

It is highly recommended to include your name and contact details; however, Levi Nine also respects the choice to stay anonymous. Please consider that providing your name will make it easier to investigate and validate the issue; this also enables us to keep you updated about the investigation's development. Once again, we want to highlight that you will be protected at all times and that Levi Nine will assure that there will be no detrimental actions taken, your name will not be shared with anyone outside of the appointed Commission and especially not with any persons who are part of the complaint.

## 4. INVESTIGATION

When the whistle-blower report is conducted by the reporting officer, Levi9 will appoint an internal commission to investigate the misconduct.

1. The Discipline Commission is appointed by the headquarters in Amsterdam
2. The Discipline Commission consists of 3-5 members, out of whom at least one member is set by the employees' representatives. The Commission selects a president and a secretary.
3. The Commission examines the actions of the person responsible for the misconduct regarding the violation of legal norms or actions that are described in chapter two of this policy.
4. The Discipline Commission has the following main attributions:
  - to verify the elements of the complaint;
  - to consult any individuals who can support the complaint;
  - to examine any information regarding the complaint;
  - to consult an external party when necessary ;
  - to write a report regarding the complaint;
  - to submit the report to the legal or conventional representative from the local delivery centre with the suggestion of the applicable sanction;
  - to inform the person who made the complaint
5. The Discipline Commission shall analyze the following aspects:
  - the reasons for the breach and whether the violation was culpably made;
  - the extent to which the employee was aware of the consequences of his/her breach or whether he/she should have been aware of the possibility of producing such a violation;
  - the attitude of the employee towards the deed and its consequences as well as the repair by the employee of the damage caused;
  - any other conclusive data.
6. The Commission shall conduct a report with the following information:

- the date and the place the meeting(s) of the Commission took place;
- the members of the Commission who took part in the meeting(s);
- mentions regarding the compliance with the convocation procedure of the employee, of the Commission and of other people, if applicable;
- the description of what happened during the meeting(s) (the discussions held, the defence formulated by the employee, etc.)
- a conclusion based on all information retrieved; • all the information that supports the conclusion;
- the signatures of all people in the Commission.

If one of the people who took part in the meeting refuses or cannot sign the report, this shall be mentioned in the same report together with the reasoning behind the refusal.

8. In the event the Commission determined that the deed under investigation is a disciplinary breach, the report shall also mention the following aspects:

- the premises of the disciplinary investigation
- the reasons behind the violation
- the circumstances of the violation;
- the degree of guilt of the employee
- the consequences of the disciplinary breach
- the general behaviour of the employee
- the possible sanctions are previously given to the employee - any other conclusive data.

9. The Commission shall submit the report to the board of Levi Nine, who will take appropriate actions towards the individual who is responsible for the misconduct, taking into consideration the following aspects:

- the reasons behind the violation
- the circumstances of the violation
- the degree of guilt of the employee
- the seriousness and consequences of the disciplinary breach
- the general behaviour of the employee
- the possible sanctions are previously given to the employee

10. The board will inform the employee who was the subject of the investigation with the board's decision. This decision should be supported by the Report the Commission conducted. Any personal information regarding the whistle-blower should be anonymized to prevent any type of reprisals. The decision can be contested by the employee in the competent courts within 30 calendar days from the communication date.

## 5. PROTECTION AS A WHISTLE-BLOWER

If you choose to disclose any information, your details will only be shared with other (third) parties when:

- you give explicit consent to share your details

- When we are obligated to share because of laws/regulations

You will always be informed before any details are shared with other parties.

Please know that reporting officers can share information that does not contain your identity, any type of personal data or information that can lead to someone identifying you as the whistleblower.

A Whistle-blower must make a Whistle-blower Report directly to an Eligible Recipient to qualify for protections under the Whistle-blower Laws and this Policy. These protections include:

- Identity protection
- Protection from Detriment
- Compensation and remedies
- Civil, criminal and administrative liability protection

Your safety is Levi Nines number one priority. Levi Nine is committed to taking all reasonable steps to protect you from detriment as a result of making a report under this policy and the Whistle-blower Laws.

We do not tolerate any forms of reprisals or detrimental Conduct.

Examples of Detrimental Conduct can include, but are not limited to:

- Dismissing/relocating an employee
- Giving negative feedback that is not reflective for the employee's behaviour
- Intimidation
- Threatening
- Harassment
- Any violent behaviour

When you are experiencing any of these examples, please immediately contact the central reporting officer (see last page for contact details). He or she will take all the appropriate steps necessary to assure your safety.

## 6. FALSE OR MISLEADING DISCLOSURES

Our drive for making this policy is to support a safe and encouraging environment for all our employees, partners and customers. That's why we protect those who are wronged.

When making a disclosure, you will be expected to have reasonable grounds to suspect the information you are disclosing is true. Still, you will not be subject to a penalty if the story turns out to be incorrect.

However, you must not make a report that you know is not true or is misleading. We consider this as an attack on the safe environment and culture we want to maintain in Levi9 and therefore, this will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report.

## 7. CONTACT LIST

### **Reporting officer Ukraine:**

Name: Maryna Iankovska

E-mail address: [m.iankovska@levi9.com](mailto:m.iankovska@levi9.com)

Phone number: +38 05 04 15 13 11

### **Reporting officer Netherlands**

Name: Nicole Stoffels

E-mail address: [n.stoffels@levi9.com](mailto:n.stoffels@levi9.com)

Phone number: +31 6 57 56 74 65