

## **Whistleblowing System Sarco**

Sarco has a clear 0-tolerance policy on corruption and bribery and complies with the OECD guidelines on corporate responsibility. You can read these guidelines by clicking on the link below:

https://www.oecdguidelines.nl/documents/publication/2014/12/8/oecd-guidelines-chapter-8-consumer-interests

If a whistleblower (this can be someone from the employees, shareholders, investors, or someone from outside the company) wants to make a report about a malpractice, corruption, child labour, etc., he or she can first contact our confidential adviser.

Because Sarco is convinced that bribery and corruption are obstacles to the development of prosperity and because Sarco wants to increase its ethical responsibility, it has appointed a confidential contact person/reporting centre within its organisation:

Sofie Van de Vyver sofiev@sarco.be

Tel: +32 3 780 36 65

The whistleblower can make a report, anonymous or not, by telephone or by e-mail, to the confidential adviser. This trustee is obliged to treat all reports with discretion. Your data will be protected in accordance with the GDPR legislation.

The whistleblower may report ethical principles, violation of laws or regulations concerning the following areas:

- Human rights
- Fraud
- Corruption
- GDPR and data protection
- Harassment and bullying
- Health and security
- Environment
- Discrimination
- Crimes or violations

What is bribery/corruption and how can you recognise it?

- Corruption is the abuse of a public or private position for personal gain, influencing someone in order to receive a reward, an improper advantage or favour.
- Dubious arrangements or fraudulent agreements.
- An offer, promise or benefit, financial or otherwise, to any person as a reward for the improper performance of certain tasks.
- Bribing a person or allowing a person to bribe you .
- Threatening or seeking revenge against someone who refuses to take part in an activity that could violate anti-bribery laws.

<sup>\*</sup> Reports must be made without ulterior motives and in good faith, not with malicious intent.



- Excessive gifts or hospitality: gifts or hospitality must be given openly and must not have an improper value.
- money-laundering

If you do not receive a response to your report, or the response is inadequate, you can turn to a number of external bodies:

- Fraud Notification system: <a href="https://fns.olaf.europa.eu/main\_en.htm">https://fns.olaf.europa.eu/main\_en.htm</a>, for reporting suspicions of corruption or fraud.
- Fair competition hotline: reports related to social fraud https://www.meldpuntsocialefraude.belgie.be/nl/index.html