

Compliance & Ethics Speak Up

FAQ

Version: 2
Entry into force: 7 May 2025



Raising concerns about misconduct or potential misconduct within bpostgroup

The answers to frequently asked questions presented in this document do not replace the policy, which contains important additional information. The answers provided here highlight the key concepts. We encourage you to familiarise yourself with the policy in its entirety.

1. If I come across a situation that leads me to suspect misconduct or potential misconduct, why should I report it?

bpostgroup is built on strong corporate values and ethical business practices, designed to support our sustainable and responsible business strategy. These values and practices reflect our commitment to our employees, suppliers, customers, business partners, shareholders and the larger society. It is essential that we build a reputation with our stakeholders as a trustworthy and ethical organisation. Together, we must ensure that our services are provided ethically and fairly.

2. What is Speak Up?

Speak Up is a reporting system provided within bpostgroup, enabling certain individuals (see question 3) to report, in complete confidence and without fear of retaliation, a situation of which they become aware and which violates or appears to violate laws, regulations, the Code of Conduct or other group policies.

3. Who can report a concern?

Anyone with information about a possible integrity breach in a professional context can report a concern.

This includes employees, trainees, volunteers, external coworkers, subcontractors, suppliers, shareholders and members of management and supervisory bodies, including non-executive directors.

Former bpostgroup employees and candidates who have participated in a recruitment process within bpostgroup are also entitled to report a concern.

4. What types of concerns can I report?

You can report any actual or potential legal violations which fall under the scope of the national whistleblowing rules as well as any actual or potential violations of bpostgroup's Code of Conduct and other internal policies.

The following concrete examples can be reported:

- Financial and economic problems: Money laundering, corruption, fraud, breaches of competition rules or international economic sanctions, conflicts of interest, abuse or misappropriation of company assets and resources, etc.
- Violations of human rights and fundamental freedoms: child labour, forced labour, non-compliance with personal data regulations and violation of privacy, non-compliance with human rights regulations within the supply chain, etc.
- Health and safety issues: non-compliance with designated measures to promote occupational health and safety (e.g. lack of safety equipment or procedures, handling of hazardous products, unsafe working conditions within the supply chain, etc.).
- Non-compliance with internal policies, such as the Code of Conduct, the Policy on contacts with competitors, the Policy on contacts with public authorities, the Bid Compliance Policy, etc.
- Retaliation related to a report: disciplinary sanctions or any discriminatory or unfavourable measure following a report made in good faith under the Speak Up policy.

This list is not exhaustive. As the scope of whistleblowing legislation varies from country to country, it may be possible to report other types of concern depending on your country. We recommend that you consult the appendix specific to your country in the Speak Up policy (Section 15).

5. What incidents or behaviour cannot be reported via Speak Up?

Some concerns or situations fall outside the scope of the Speak Up policy and should be handled through other appropriate channels. This applies to the following cases:

- Grievances relating to individual employment conditions: Employees of bpostgroup should address their question(s) or complaint(s) concerning their working conditions or terms of employment via the usual HR procedures, i.e. by directly contacting your immediate superior, your HR manager and/or your trade union representative.
- Acts of discrimination or harassment: Such behaviour does not fall within the scope of the Speak Up process, unless the legislation of your country states otherwise. If you witness or are a victim of discrimination, harassment or any other psychosocial risk at work, we encourage you to contact the relevant department in your organisation directly and/or the authorised bodies that can support you and handle your situation.
- Immediate threats to life, health and safety or property: The Speak Up policy's internal reporting channels must not be used to report an immediate threat. In an emergency, contact your local authorities or dial your country's emergency number. For example, the number 112 for countries belonging to the European Union.

In addition, it is important to know that some information – whatever its form or medium – cannot be reported if it has been obtained by committing a criminal offence (theft of documents, illegal recordings, etc.) or is covered by national security secrecy, the secrecy of investigations, the secrecy of judicial inquiries, medical secrecy or professional secrecy between lawyer and client, unless the information directly concerns the whistleblower (exchanges with their lawyer or personal medical data).

6. What conditions must be met to submit a report?

For your report to be taken into account under the Speak Up policy, several conditions must be met:

1. You must be authorised to submit a report in accordance with this policy (bpostgroup employee, subcontractor, etc.).

2. The incidents reported must concern actual or potential violations that have occurred or are likely to occur within bpostgroup or in the context of its activities, and of which you have become aware in a professional context.
3. You must have reasonable grounds to believe that the facts of the reported incidents are true at the time of reporting. You must not base your report on rumours or defamatory accusations.
4. The subject of your report must fall within the scope of the Speak Up policy.
5. Reports must be carried out via one of the internal channels provided for in the Speak Up policy.

If these conditions are met, your report will be handled in accordance with the rules described in the Speak Up policy.

7. Who should I contact to report a concern?

If you are a member of bpostgroup staff, you are encouraged to report your concern in the following way:

- In the first instance, contact your immediate superior, who will be able to handle the situation or escalate it if necessary.
- If this is not possible, or if you do not feel that the response is appropriate, you can use the internal reporting channels provided for in the Speak Up policy.

If you are not a member of staff (e.g. former employee, subcontractor), you can use the internal reporting channels directly.

8. How do I submit a report using the Speak Up tool?

To report a concern via the Speak Up tool, please follow the steps below:

1. Start by visiting the Speak Up home page: https://app.convercent.com/en-gb/Anonymous/IssueIntake/LandingPage/6a654d83-1a6c-ed11-a993-000d3ab9f296?_id=1670322041371
2. Once on this page, select the "Report an Incident" menu, then read and accept the warning message that appears on your screen.

3. You can then write your report, describing the problem in detail (incident, person(s) involved, location, date) and, if possible, adding supporting documents (screenshots, documents, etc.). You will also be asked to fill in your contact details: state your link with bpostgroup (employee, former employee or external coworker) and choose whether or not to remain anonymous. Your identity is protected in any case.
4. You will need to indicate your follow-up preferences: we recommend that you choose to receive notifications about the progress of your report so that you can stay informed throughout the process. You can also choose the contact method that suits you best for communicating with your case manager (email, telephone, etc.). Select an option that allows you to remain easily contactable to ensure effective follow-up of your report.
5. Before finally submitting your report, you will have the opportunity to review all the information provided. If necessary, you will be able to go back to correct or complete your report and/or your contact details before sending it.
6. Once you have submitted your report, you will need to create a personal password and a confidential access number will be displayed on the screen. It is essential that you keep and remember this information, as you will need it to access the Speak Up tool, which will allow you to communicate with your case manager, check your messages and track the progress of your report in complete confidentiality.

9. Can I report a concern anonymously?

Yes, you can report a concern anonymously, unless your country's legislation prohibits this. In this case, your identity will not be communicated to your case manager and all correspondence will be made exclusively via the Speak Up tool.

As an anonymous report can be difficult to process if the information provided is insufficient, we recommend that you provide as much detail as you can and, if possible, supporting documents to ensure that your report is processed efficiently.

To report a problem anonymously, use the Speak Up tool. We do not recommend that you use the telephone hotline or send a registered letter, as these methods do not allow you to receive feedback or to communicate with the case manager.

Finally, it is essential to retain your confidential access number and password, as they will enable you to access the Speak Up tool to communicate anonymously with your case manager. These login details are the only way for you to track the progress of your report or to respond to any requests for further information.

10. Can I submit a report via email to the bpostgroup Compliance department (Speak Up team)?

No, it is not possible to submit a report via email to the Speak Up team.

To submit a report, you must use one of the three internal reporting channels: the Speak Up tool, the telephone hotline or by sending a registered letter.

The Speak Up team email address (speak-up@bpost.be) is used solely to facilitate communication between the case manager(s) and those involved in an investigation, such as witnesses or the persons concerned, who do not have access to the Speak Up tool.

11. Who can access my report?

When you submit a report via the Speak Up tool or the telephone hotline, its content is only accessible to members of the Speak Up team in the bpostgroup Compliance department.

After receiving your report, the Speak Up team will appoint a case manager. This will either be a member of the Speak Up team, or a person within the subsidiary concerned who is competent to handle this type of report.

If you submit your report by registered letter, the entity receiving your letter will have access to your report and will be responsible for its processing and follow-up.

12. How is confidentiality protected?

The Speak Up tool is hosted outside bpostgroup's IT systems, on a secure, encrypted platform in order to protect all information related to the investigations.

A report is shared only on a strictly necessary basis, only communicating the essential information to those involved in the investigation or in implementing corrective measures. Particular attention is paid to the processing of personal data.

Any violation of this obligation by a person involved in an investigation may result in sanctions.

13. Can I trust the Speak Up procedure? Is my identity sufficiently protected?

Yes. bpostgroup attaches the utmost importance to confidentiality and the protection of your identity throughout the Speak Up procedure. Your report will be treated with the utmost discretion, whether anonymous or not.

Only strictly authorised persons, subject to an obligation of confidentiality, may access your personal data and your report. Under no circumstances may these people disclose your identity or any information that directly or indirectly enables you to be identified without your explicit consent.

14. What are the different stages in the Speak Up procedure?

The Speak Up procedure is divided into several stages:

1. Submission of the report

Reports made via the Speak Up tool or the secure telephone hotline are forwarded to bpostgroup Compliance department (Speak Up team). Those sent by registered letter are received and managed by the local manager of the subsidiary concerned.

2. Advice of receipt

Once you have submitted your report, you will receive an advice of receipt via the Speak Up tool or by registered letter. Your report will then be assigned to a case manager. This advice of receipt confirms receipt of the report, but does not guarantee its admissibility.

3. Admissibility verification

The case manager will then determine whether your report falls within the scope of the Speak Up policy and applicable laws. A report may be deemed inadmissible if it does not concern violations or breaches covered by this policy, if it lacks concrete evidence or if it falls within the scope of another, more appropriate reporting channel.

In this case, you will be informed and, if possible, referred to the appropriate department. You may also be asked for additional information before a decision is taken on the admissibility of your report.

4. Analysis of reported incidents

If your report is admissible, an in-depth analysis will be carried out to verify the accuracy of the incidents reported in an independent and impartial manner. This analysis may include a range of investigative work, such as conducting interviews with the persons concerned, examining relevant documents and recordings, and analysing other available evidence.

5. Closure of the investigation and follow-up

Within three months of the advice of receipt, you will be informed of the progress made in processing your report:

- If the investigation has been completed, a confidential report is sent to the appropriate management team, who will decide what action to take. You will be informed of the general conclusions, but you will not have access to the final report, as it contains confidential and potentially sensitive information, particularly concerning the people involved and any recommendations made. This confidentiality is essential to protect all parties involved and guarantee the integrity of the process.
- If the investigation is still ongoing, you will receive an update.

15. How long does it take to investigate a report?

An investigation generally lasts three months, but can be extended to one year depending on the complexity of the incidents reported. The case manager ensures that the investigation remains as swift and efficient as possible. You will be informed every three months of the progress of your report.

16. How can I contact my case manager after submitting a report?

When you send your report via the Speak Up tool or the telephone hotline, you will receive a login and set a password to access a secure chat box for further communication with your case manager. You can access this chat box by clicking on the "Check Status" tab on the Speak Up tool.

If you submit your report by registered letter, your case manager will only be able to contact you if you have included your contact details in your letter. Without this information, it will be difficult to establish communication with you.

17. Can I receive an email notification if someone asks me a question via the Speak Up tool?

Yes, this is possible. When submitting your report, you must tick the box "I would like to receive emails when the case is updated". We strongly recommend that you do so, so that you can keep up to date with developments in your case. You can enable this option even if you wish to remain anonymous. In this case, your email address will not be visible to the Speak Up team.

18. Why can't people interviewed as part of a Speak Up investigation talk about the case to third parties (inside or outside bpostgroup), including their colleagues and immediate superiors?

Because it is crucial that Speak Up investigations remain confidential. Disclosing even part of an investigation could compromise its smooth running and constitute serious professional misconduct. Any breach of this principle of confidentiality may result in disciplinary sanctions.

19. Am I protected against retaliation if I make a report?

Yes, if you make a report in good faith, you are protected against retaliation, even if the incidents reported turn out to be inaccurate after examination. Reporting in good faith means that you have reasonable grounds for believing that the incidents reported could constitute misconduct. Good faith does not mean that you have to be right in your assessment, but that you are acting sincerely and responsibly.

If you believe you are a victim of retaliation, report it immediately via the internal reporting channels (Speak Up tool, telephone hotline or registered letter) so that appropriate action can be taken.

This protection does not apply to reports made in bad faith, i.e. with the intention of causing harm or in the knowledge that the information is false. Such breaches may result in disciplinary sanctions.

20.

Who can report a concern? What happens if the concern I'm reporting concerns a superior, a senior manager or a member of top management?

You will also be protected against retaliation.

We have set up an Escalation Procedure. This procedure is designed to ensure that, whatever the hierarchical level of the person reported, each case is thoroughly investigated with due respect for the rights of both the person who reported the concern and the person who is the subject of the concern.

21.

I have been contacted as part of an investigation to be heard as a witness. What should I do?

You have been contacted as a witness because the person(s) in charge of the investigation believe(s) that you have information that could clarify certain points and contribute to the progress of the investigation. Your participation is therefore essential.

Depending on the legislation in force in your country, you may be accompanied by a person of your choice, such as a lawyer or trade union representative, during the investigation interview. This decision is entirely up to you: you are free to choose whether or not you need support. There is no obligation in this respect.

22.

I have been contacted as part of an investigation to be heard as the person concerned. What should I do?

You have the status of the person concerned if your name is directly mentioned in the report.

Being the subject of an investigation does not automatically mean that you are at fault. You will have the opportunity to present your version of events and provide any information that may be useful to the investigation.

Depending on the legislation in force in your country, you may be accompanied by a person of your choice, such as a lawyer or trade union representative, during the investigation interview. This decision is entirely up to you: you are free to choose whether or not you need support. There is no obligation in this respect.

23.

Can I report a concern/ violation/integrity breach involving another person within the company?

Yes. Your report may concern any person within the company or bpostgroup.

24.

What might the results of a Speak Up investigation be?

A Speak Up investigation can lead to several conclusions:

- It may be concluded that there has been no breach of integrity and that no specific action is required.
- It may be concluded that a breach of integrity has occurred and that one (or several) specific action(s) is/are required, in which case individual and/or collective recommendations are made so that the relevant management teams can take the necessary measures (initiating disciplinary proceedings, establishing internal guidelines, etc.).

25.

Can a Speak Up investigation lead to disciplinary proceedings?

The Speak Up team has no disciplinary powers, but if the investigation reveals sufficient evidence, it may recommend in its final report to management that disciplinary proceedings be initiated. It is then the management's decision as to whether or not to implement the appropriate measures.

26.

Can I withdraw a report after submitting it?

No. Once your report has been submitted, it cannot be modified or withdrawn. You can, however, add further information and ask the Speak Up team to close the current investigation. The Speak Up team will then determine whether or not it is appropriate to close it.