



COMPLIANCE

Annual Compliance

Newsletter 2022

deugro group has continued to expand its business in freight forwarding and project logistics, and at the core of all our business activities is ensuring that our stakeholders trust our brand. This trust is reinforced by our strong ethics and compliance culture.

Working Towards a Higher Level of Compliance

We are pleased to present our annual Compliance newsletter, which will keep you, our business partners, informed about our efforts in the Legal and Compliance Departments to support the group's reputation of integrity and compliance with all relevant laws and regulations.

Our aim in this edition is to highlight the importance of deugro group's comprehensive Ethics and Compliance program and to explain how we manage specific risks.

Bribery and corruption

Some people refer to bribery and corruption as "the cost of doing business globally," but deugro group disagrees. We believe that bribery and corruption damages the global economy, undermines our corporate values, and breaks the law. Our Anti-Corruption Policy is consistent with international standards, and we have many controls in place to detect and mitigate bribery and corruption risks.

Gifts and hospitality

deugro group believes that gifts and hospitality play an important role in facilitating business relationships; however,

we must also acknowledge the risks associated with giving or receiving gifts or gestures of hospitality. deugro group allows for reasonable, adequate and moderate gifts and hospitality, unless receiving such gifts or hospitality is restricted by local law. Also, gifts and hospitality during a tender or bidding process are strictly forbidden to ensure integrity in the process. Finally, if you do wish to send any individual or team within deugro gifts and gestures of hospitality, please send them to the respective deugro office so that we can share!

Trade controls and sanctions

deugro group's global presence makes it critical for us to ensure that we have thoughtful and tailored policies on compliance with trade controls. Our Transport Management System is at the center of all operational activities. This system automatically screens names and addresses against preselected international sanction lists, which are updated on a daily basis. In light of the invasion of the Ukraine, and the subsequent imposition of wide-ranging sanctions, deugro group's senior management has decided to wind down current business linked to Russia and Belarus, and to decline to participate in any new business with links to these countries.

ISO 37001 certification

We have taken significant steps and implemented important measures to comply with the requirements of the ISO 37001 certification, including undertaking regular bribery risk assessments and due diligence on our projects and our business associates.

Speak Up! tool

The Speak Up! tool is deugro group's very own whistleblowing hotline—and it's open to you! We depend greatly on our stakeholders to report any potential violation of our Code of Ethics and Compliance Policy and any other concerns they might have. Reports can be made anonymously, and will be investigated in accordance with

our Investigations and Disciplinary Actions procedure. If you have questions about what this process entails, we will gladly provide you with the details.

If something does not seem right: Speak Up!. You can access the hotline or file an online report at www.deugro-group.com/speakup or via e-mail to our Compliance Department at compliance@deugro-group.com.

Finally, please always remember that deugro group and its companies are committed to the highest standards of ethical business conduct and integrity. We are proud to support you, our business partners, as you continue to reflect this commitment through the way you conduct business every day!



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