



# **WHISTLEBLOWING PROCEDURE**

## **TROPICORE SA**

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**Implementation date : 01-06-2021**



## **1. Introduction**

Through its activities, TROPICORE SA commits to purchase and sell natural rubber which has been produced responsibly and sustainably, throughout its value chain, in accordance with the 12 Principles of the Global Platform for Sustainable Natural Rubber (GPSNR).

Our commitments are described in our Natural Rubber CSR Policy, in the Natural Rubber CSR supplier code of conduct, in the Headquarters CSR code of conduct and in the Employee and Business code of ethics.

In order to ensure that its commitments and its Code of ethics, in particular, are completely and correctly respected, TROPICORE SA sets up a whistleblowing procedure that protects the identity of individuals who report alleged violations, and ensures their protection and their safety to avoid any reprisals.

## **2. Principles**

TROPICORE SA does not tolerate improper conduct, as defined hereunder, by its employees, executives, clients, suppliers and stakeholders.

This procedure is intended to encourage staff and third parties to report suspected or actual occurrences of illegal, unethical or inappropriate events confidentially, without fear of retribution.

TROPICORE SA recognises the value of transparency and accountability in its administrative and management practices, and supports the making of disclosures that reveal corrupt, unethical or illegal conduct, conduct involving a substantial mismanagement of company resources, conduct involving a substantial risk to its employees', stakeholders' or customers' health and safety, conduct that represents a risk to the environment, and generally any breach of its commitments.

## **3. Objective**

This procedure is applicable to all employees, third parties, suppliers, visitors and stakeholders of TROPICORE SA.

## **4. Definitions**

Code of ethics: Employee and Business code of ethics.

Whistleblower : anyone who reports fraud, corruption, alleged crimes or any breach of the code of ethics or any of the commitments listed in our Natural Rubber CSR Policy, in the Natural Rubber CSR supplier code of conduct or in the Headquarters CSR code of conduct, to the line manager or the Compliance Officer.



## 5. Guidelines

### - Making a report

If an employee knows, or suspects, that some wrongdoing is occurring within TROPICORE SA, he or she should raise the matter immediately with their line manager. If the employee is not able to approach their line manager (for example if it's believed that they are involved in any wrongdoing), the employee should contact the General Manager and/or state their concerns in writing to the Compliance Officer.

Any other whistleblower (non-employee) should state their concerns in writing to the General Manager of TROPICORE SA or the Compliance Officer.

Whistleblower should provide (when possible) evidences in their report.

Any manager who is informed by an employee or a third party of a potential wrongdoing should advise the Compliance Officer.

### - Actions

Le Compliance Officer will take immediate action on behalf of TROPICORE SA to promptly investigate the situation.

TROPICORE SA will treat all disclosures consistently and fairly; and will maintain the confidentiality of the whistleblower.

The employee or the third party who has raised the issue of wrongdoing will be kept informed of any investigation that is taking place.

### - Alerting outside bodies

The media is not a relevant external body.

Employees and suppliers should not contact the media with allegations about TROPICORE SA. Making allegations or disclosing information in an inappropriate way (e.g. contacting the media or making malicious allegations) could result in disciplinary action being taken against the employee.

### - Protection against detriment

TROPICORE SA will not tolerate any action, including reprisals, against those whistleblowers who come forward in good faith to disclose such conduct. If any of the above mentioned in the scope of this procedure retaliate against the whistleblower (who reports an event in good faith) he/she will be subject to disciplinary action,



including termination of their employment and/or legal action against them by TROPICORE SA, where appropriate.

The identity of the whistle blower shall at all times remain confidential to the persons directly involved in implementing this procedure, unless the issue requires investigation by law enforcement, in which case the whistle blower may be subject to subpoena.

TROPICORE SA Compliance Officer  
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