

Business Ethics Policy

Purpose and scope

At Globetrade, we are committed to maintain the highest standards of business ethics and integrity. This Business Ethics Policy outlines the principles and guidelines that govern our conduct. It is designed to ensure that all employees, partners, and stakeholders act in alignment with our people-oriented culture and ethical standards.

A. CORE VALUES IN OUR PEOPLE-ORIENTED CULTURE

Our actions and decisions are guided by the core values of **integrity, respect, fairness, and transparency**. We believe these values are fundamental to build trust and maintain strong relationships with employees, partners, and stakeholders.

Expected behaviour

All employees, partners, and stakeholders are expected to conduct themselves in a manner that reflects Globetrade's values. This includes:

- Act with integrity and professionalism;
- Treat others with respect and dignity;
- Comply with all applicable laws, regulations, and internal policies.

Unacceptable behaviour

Unacceptable conduct includes, but is not limited to:

- Discrimination;
- Harassment;
- Bullying;
- Inappropriate sexual behaviour;
- Acts or threats of violence.

Such behaviours are strictly prohibited as they undermine individual well-being and organisational effectiveness.

Definitions

- **Discrimination:** The unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex or disability.
- **Harassment:** Unwelcome conduct that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

- **Bullying:** Repeated aggressive behaviour, whether verbal or physical, intended to harm another person mentally or physically.
- **Inappropriate sexual behaviour:** Verbal, non-verbal, or physical behaviour with sexual connotations that affects an individual's dignity or personal integrity. This includes unwelcome touching, suggestive remarks, intimidation, unsolicited messages, voyeurism, sexual assault, rape, or the unauthorized taking or sharing of images.
- **Violence:** The use of physical force with the intent to harm, damage, or kill someone or something.

B. ETHICAL STANDARDS

Corruption and bribery

Globetrade enforces a zero-tolerance policy towards corruption and bribery. We are committed to conduct our business in an ethical and lawful manner. Employees must not offer, give, solicit, or accept any form of bribe.

Any suspicion or knowledge of corrupt practices must be reported immediately through the appropriate channels.

Definitions

- **Corruption:** The abuse of power or position for personal gain, including dishonest or unlawful behaviour such as bribery or fraud.
- **Bribery:** The unlawful offering, giving, receiving, or soliciting of any item of value to influence the actions of an individual in a position of power.

Conflict of interest, fraud, and money laundering

Conflict of Interest

Employees must avoid situations where their personal interests could conflict, or appear to conflict, with the interests of Globetrade. This includes but is not limited to relationships or dealings that could influence an employee's ability to act objectively and in the best interests of the company. If an actual or potential conflict arises, it must be disclosed to management immediately.

Fraud and Money Laundering

Globetrade maintains a zero-tolerance approach toward fraud and money laundering. We are committed to prevent, detect, and address any such activities within our operations or by third parties acting on our behalf.

- **Fraud** refers to wrongful or criminal deception intended to result in financial or personal gain.

- **Money laundering** is the process of concealing the origins of money obtained illegally, typically by means of complex financial transactions involving foreign banks or legitimate businesses.

Employees must be vigilant and report any suspicious behaviour, transactions, or documentation to their team lead or the HR department without delay.

Gifts and Hospitality

To prevent undue influence and maintain integrity in business relationships:

- Employees must not promise or provide customers with pecuniary (e.g., payments, loans) or non-pecuniary gifts (e.g., holiday travel, personal favours), nor should they accept such gifts from suppliers or business partners.
- Acceptable exceptions include ordinary promotional items of limited value (defined as not exceeding 150 EUR).
- Any gifts received from Globettrade to external parties must be approved in writing by the responsible team lead.
- In cases of doubt, or when offered gifts or hospitality exceed the accepted limits or norms, employees must seek guidance from their team lead or the HR department.
- For gifts/events exceeding these guidelines, a full description of the occasion, estimated value, business purpose, and any relevant supporting information must be provided and approved.

Information security concerns

Globettrade is committed to protect the confidentiality, integrity, and availability of its information assets. All employees must adhere to the company's information security policies and procedures to prevent unauthorized access, disclosure, alteration, or destruction of sensitive information. Any concerns or incidents related to information security must be reported immediately to the appropriate contact person or department.

Supplier Code of Conduct

Globettrade is committed to ensure that our ethical standards extend throughout our supply chain. All suppliers, contractors, and business partners are expected to comply with our Supplier Code of Conduct, which outlines our expectations regarding:

- Compliance with laws and regulations
- Human rights and labour practices
- Environmental responsibility
- Anti-corruption and fair competition
- Health and safety standards

Adherence to the Supplier Code of Conduct is a condition of doing business with Globettrade. We reserve the right to assess and monitor compliance and to take appropriate action in

cases of non-compliance, including termination of the business relationship. The full Supplier Code of Conduct is available upon request or can be accessed via the company website.

Reporting misconduct

If you witness or suspect any unethical, unlawful, or policy-violating behaviour, you are expected to report it promptly. Globetrade encourages a culture of openness and accountability, and provides several channels for reporting misconduct:

Internal reporting channels

1. Speak directly with your supervisor or team lead.
2. Contact the **Psychosocial risk prevention advisor**, or **HR Department**.
3. Use the **anonymous whistleblower system**, accessible on the company website: www.globetrade.be

External reporting channels

- Contact your designated point of contact at Globetrade.
- Use the **anonymous whistleblower system**, accessible on the company website: www.globetrade.be

Confidentiality and protection of whistleblowers

All reports of misconduct will be treated with the highest level of confidentiality. Employees who report concerns in **good faith** will be protected from any form of retaliation or adverse action. Retaliatory behaviour against whistleblowers is strictly prohibited and will be addressed through disciplinary measures.

Consequences of policy violations

Violations of this Business Ethics Policy may result in disciplinary action, up to and including termination of employment or contractual relationship. Globetrade will take all necessary measures to investigate reported violations and ensure that appropriate actions are taken.

Monitoring and Updates

This Business Ethics Policy will be regularly reviewed and updated to reflect changes in legislation, business practices, and organizational needs. All employees, partners, and stakeholders will be informed of any significant updates or amendments to the policy.

Annex I – Contact Persons

- **Psychosocial Risk Prevention Advisor:** Frederiek De Potter
- **Human Resources (HR):** Julie De Bruyne
- **Whistleblower Reporting System:** Anonymous submission available on the company website: www.globetrade.be

Annex II – Whistleblower Report Form

WHISTLEBLOWER REPORT FORM

Please use this form to report any misconduct, suspected breaches of law, regulation, or company policy at Globetrade. If you choose to provide your contact information, we may reach out for further clarification or additional details during the investigation.

Note: You may submit this form anonymously. All information provided will be treated with strict confidentiality.

SECTION A: REPORTER'S CONTACT INFORMATION

(Optional – may be left blank to remain anonymous)

- Name:
- Department:
- Contact Number:
- Email Address:

SECTION B: SUSPECT'S INFORMATION

- Name:
- Department:
- Contact Number:
- Email Address:

SECTION C: WITNESS INFORMATION *(If any)*

- Name:
- Department:
- Contact Number:
- Email Address:

SECTION D: COMPLAINT DETAILS

Please provide as much detail as possible. If more than one allegation is being reported, number each item clearly and attach additional pages if necessary.

1. What misconduct or improper activity occurred?
2. Who committed the misconduct or improper activity?
3. When did the incident(s) occur? When did you first become aware of it?
4. Where did the incident(s) take place?
5. Do you have any evidence to support the allegation?
(Please attach documents, emails, photos, etc. if available.)
6. Are any other individuals involved, beyond the suspect named above?
7. Do you have any additional information that may help in the investigation?
8. Any other comments or observations?

Date of Submission: _____

Signature: _____ *(If not anonymous)*