

# **CNT Grievance Procedure**

## **Introduction, purpose & scope**

In the CNT's Internal Code of Conduct, we have defined the values and ethical behaviors principles and standards of how we should operate. In addition to the observance of law and order, it is also about describing ethical conduct that are expected when interacting with individuals, group of persons, and the environment around us. The Code of Conduct is mandatory and applies to all the company's directors and employees, including senior management, interns, and seasonal, part-time, and permanent employees.

The following Guidelines aim to outline the process for reporting practices or actions believed to be inappropriate or illegal. Raising in good faith ethics and compliance issues helps us prevent, detect, and respond to any misconduct while securing CNT's reputation.

## **Confidentiality requirements**

The persons entrusted with the investigation and resolution of grievances are obliged to maintain the confidentiality of the case and to comply with the statutory data protection regulations during and after the resolution. The CNT Integrity Line offers the possibility to communicate anonymously via a file number. In any case, this is done via a password-protected postbox. Information will only be used for the purpose of the investigation and the resulting measures.

However, a report with an open indication of identity facilitates and accelerates the processing and clarification of reported facts, for example through the possibility of direct discussions.

If the whistleblower decides to share own personal information, this will not be passed on without an explicit approval consent. The consent to the release of the identity can also be revoked at any time. This shall apply unless otherwise instructed by administrative or judicial order, for instance when disclosure is necessary for the accused person to exercise the right to be heard. In this case, the whistleblower will be informed immediately.

The above statements apply equally to third parties who testify or are questioned in the context of clarifying the facts.

## **Protection of the Whistleblower**

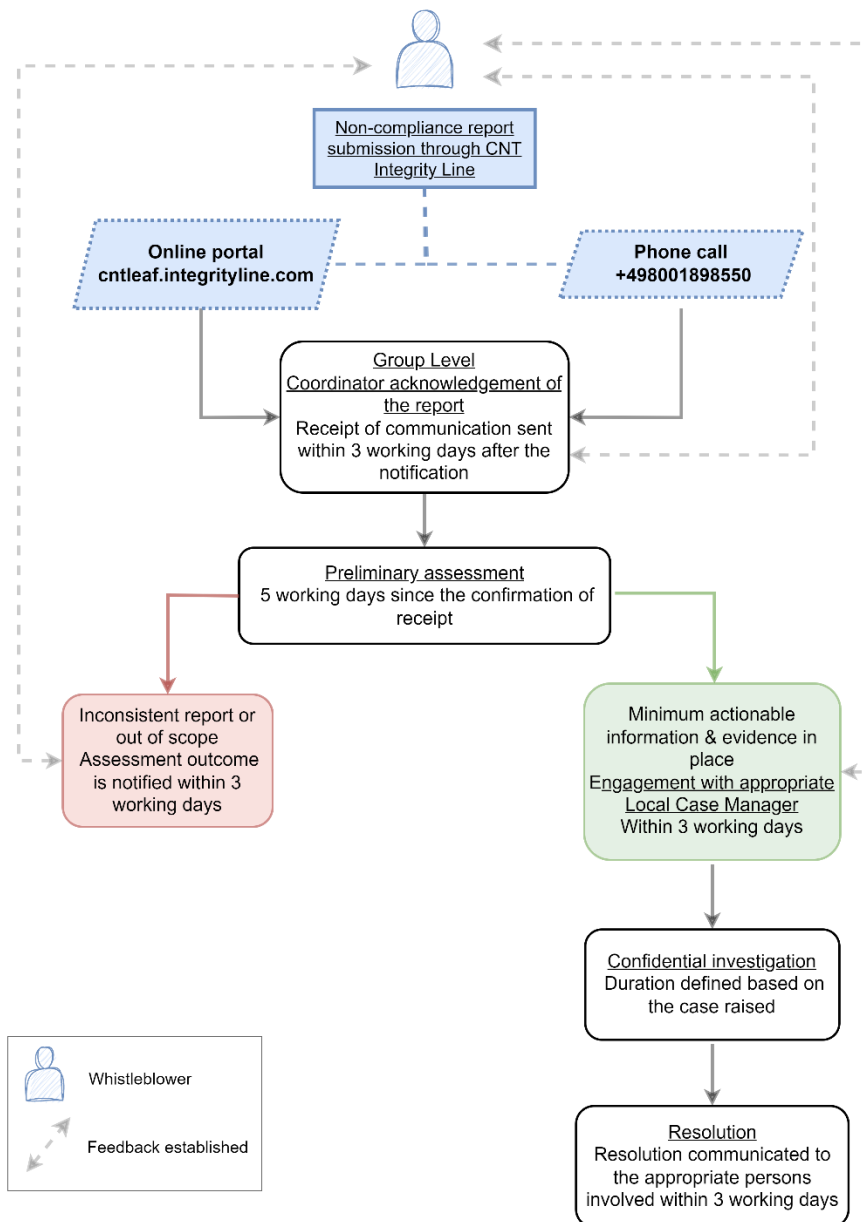
Anyone who raises concerns, or highlights potential or actual breaches, in good faith will receive the company support and respect, and any act of retaliation against it will be treated as a serious disciplinary matter. Likewise, any person involved in a formal investigation or similar type of inquiry, is expected to cooperate with honesty and integrity, and to comply with the confidentiality requirements.

## **Misuse of the Grievance Mechanism**

Raising concerns could result into serious disciplinary or legal action against the person(s) involved. Therefore, the Grievance Mechanism must be used responsibly, in good faith. By good faith we mean that the whistleblower is reporting in an honest and sincere way, with no malicious intent, such as deliberately seeking to defame a person through lying about an issue or incident in the knowledge that this will cause harm. Concerns raised that are intentionally false, misleading, or malicious may result in disciplinary action.

### **CNT Integrity Line Grievance Procedure:**

- a. The whistleblower submits a report to the CNT Integrity Line through:
  - i. The online portal ([cntleaf.integrityline.com](http://cntleaf.integrityline.com)), or
  - ii. By contacting a non-company hotline at the phone number **+498001898550**.
- b. Coordinators on Group Level (GLC) are notified and have 3 working days to send a receipt of communication to the Whistleblower.
- c. The Group Level Coordinators carry out a preliminary assessment of the raised report. Based on the assessment, the GLC could determine that:
  - i. The report is inconsistent or out of scope; the Whistleblower will be notified and have the option to rectify the report.
  - ii. The report has minimum actionable information and evidence in place; allowing the process to move forward to selecting and engaging, within the following 3 working days, with a relevant Local Case Manager. When appropriate, the action plan developed will be discussed with the Whistleblower to confirm its consent. When necessary, an external consultant will be engaged to assess in the process. Unless it is an anonymous report, the identity of the whistleblower will only be disclosed to external parties with its explicit consent.
- d. A confidential investigation take place. The duration of this stage will depend on the case raised, including the severity and the scope of the issue. When appropriate, the updates of the investigation carried out will be notified and discussed with the Whistleblower.
- e. When the confidential investigation concludes, and the outcomes are compelling, the formal resolution will be communicated to the appropriate persons involved within 3 working days.



## Reporting of suspected cases

A semiannual report will be presented to the Managing Directors detailing:

- Number of non-compliance concerns reports received during the reporting period.
- Number of cases substantiated during the reporting period.
- Number of closed cases during the reporting period.
- Number of cases with pendant resolution.
- Number of each non-compliance category over the total number of cases substantiated during the reporting period.

Confidential data protection will remain safeguarded.

## **Privacy**

The confidential and compliant handling of personal data is essential for an effective whistleblowing system. The data protection information is described in detail and can be viewed under the following link:

[cntleaf - Privacy policy \(integrityline.com\)](#)

[Terms and Conditions | EQS Group](#)