TRANSLATION FROM THE GERMAN LANGUAGE

Information on the use of a whistleblowing system (Whistleblowing)

1. Introduction

A whistleblowing office has been established at the following Logwin companies:

Logwin Solutions Logistik GmbH (DE)
Logwin Holding Aschaffenburg GmbH (DE)
Logwin Air + Ocean Deutschland GmbH (DE)
Logwin Air + Ocean Austria GmbH (AT)
Logwin Solutions Austria GmbH (AT)
Logwin Poland Sp. z o.o. (PL)
Logwin Romania S.R.L. (RO)

where an authorised representative receives reports as a person of trust (hereinafter "**Whistleblowing Officer"**). This information is intended to create the framework for reporting possible compliance violations. With this guideline, we want to create trust and encourage you to participate. In doing so, you will make a valuable contribution to ensuring that we act together responsibly and lawfully.

2. Whistleblower

The whistleblower system can be used by all individuals who have obtained information about violations of laws and guidelines as well as possible criminal offences in connection with their professional or official activities (concerning the Logwin companies mentioned under section 1) (hereinafter "**whistleblowers**").

3. Relevant information; good faith

3.1 The Whistleblowing Officer is responsible for receiving and processing reports of actual or alleged violations of laws and policies and any criminal offences (see **Appendix 1** for details).

3.2 Only those reports should be made where the whistleblower has a good faith belief that the facts reported by them are accurate. A whistleblower is in good faith if, at the time of the report, they had reasonable grounds to believe that the information reported was true.

In case of doubt, the corresponding facts are not to be reported as facts but as a presumption, or as a statement by another person. If the examination of the report reveals that there is no reasonable suspicion or that the facts are not sufficient to substantiate a suspicion, whistleblowers reporting in good faith do not have to fear any disadvantages.

3.3 Logwin would like to point out that a whistleblower is obliged to compensate the damage resulting from a deliberate or grossly negligent reporting of incorrect information. In addition, criminal liability cannot be ruled out in the case of intentional reporting of false information.

4. Rules of procedure

4.1 Reports about actual or alleged violations of laws and guidelines as well as any criminal offences should be submitted to the company's Whistleblowing Officer as a person of trust and neutral intermediary. The submission of such reports is not bound to a specific form. Every report will be treated confidentially and in compliance with the applicable data protection laws.

Ms. Stella Grenz-Richter will assume the function of an external Whistleblowing Officer for all German and Austrian Logwin companies (mentioned in section 1) and can be reached as follows:

Telephone: +49- 6073 6069826
Email: Hinweisgeberstelle@grenz-richter.de

Mr Sławomir Maciag will assume the function of a Whistleblowing Officer For the Polish company (mentioned in section 1). Notifications can be made within an anonymous portal under the following link:

https://report.whistleb.com/pl/logwin

Ms Elena-Alexandra Poiana will assume the function of an internal Whistleblowing Officer for the Romanian company (mentioned in section 1). Notifications can be made as follows:

Tel.: +40-741524196
Email: elena.poiana@logwin-logistics.com

4.2 Reporting to the Whistleblowing Officer ensures fast and efficient processing. When the Whistleblower Protection Act comes into force, it will also be possible to turn to an external reporting office for certain violations. As soon as the legal requirements have been established and these reporting offices have been set up by the relevant Federal Governments, whistleblowers will be informed and the Whistleblowing Officer will provide information on external reporting procedures and offices.

4.3 The disclosure of information on actual or suspected violations to external third parties (disclosures to the public) requires that the whistleblower first contacted the Whistleblowing Officer and that the Whistleblowing Officer did not take appropriate action within a time frame of three months or that the whistleblower has sufficient reason to believe that the violation may pose an immediate or obvious threat to public interest.

5. Case management process, confidentiality requirement

5.1 Any reference to an issue to be reported should be as specific as possible, giving the background, description of the specific event, names, dates, places and other information. Supporting documents should be provided if available.

5.2 As an independent body, the Whistleblowing Officer examines the incoming reports in compliance with the confidentiality requirement. If the Whistleblowing Officer is of the opinion that further investigations should be carried out, they document this and forward the information to the responsible Compliance Officer. The responsible Compliance Officer for the companies mentioned under section 1 is the Chief Compliance Officer of Logwin AG. The Compliance Officer then carries out the internal investigations in a timely manner. The whistleblower is informed by the Whistleblowing Officer about the progress of the proceedings to the extent legally permissible.

5.3 If a report turns out to be false or cannot be sufficiently substantiated with facts, this will be documented accordingly and the procedure will be discontinued immediately. There will be no consequences for the whistleblower, in particular the case will not be documented in the personnel file. The whistleblower will be informed accordingly.

5.4 The whistleblower decides whether or not they wish to preserve their identity. The Whistleblowing Officer ensures that reports from whistleblowers who do not wish to be identified are passed on anonymously to the responsible Compliance Officer, unless there is a legal obligation to disclose.

6. Protection of the whistleblower and the persons involved in the investigation

6.1 Provided that a whistleblower has followed the procedure prescribed in s. 4 for submitting the report and the information reported is true or the whistleblower at least had sufficient reason to believe that this was the case, they need not fear any disadvantages resulting from a report (e.g. reprimand, warning, dismissal, suspension, discrimination). The same applies to persons who confidentially support the whistleblower in making a report in a professional context.

6.2 Should a whistleblower or a person assisting in the clarification of the suspicion be of the opinion that they are disadvantaged because of a reported information, this must be reported to the Whistleblowing Officer or the responsible Compliance Officer.

7. Information and hearing of the reported person

Any person affected by a report is to be notified of the suspicions directed against them at the appropriate time, taking into account the requirements of data protection law, unless such notification would significantly impede the progress of the proceedings to establish the facts of the case. Such notification must be made at the latest upon completion of the investigation. The person affected will be heard by the Chief Compliance Officer of Logwin AG before conclusions are drawn at the end of the procedure explained above, in which the name of the person will be disclosed.

8. Data Protection

All information, including references to the whistleblower, will be processed confidentially within the framework of the applicable laws. Details on the handling of personal data collected and stored within the framework of the present procedure can be found in the data protection information of the whistleblowing offices available in our intranet, or directly within the notification processes.

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Schedule 1

Overview of matters falling under the competence of the Whistleblowing Officer [in particular]*.

- Prohibited insider trading,
- fraud, money laundering, misconduct by false accounting and internal accounting controls,
- Auditing offences,
- Corruption,
- Money laundering,
- Falsification of contracts, reports or records,
- Misuse of company assets, theft or embezzlement,
- Bribery, abuse of office,
- Violations of competition law,
- Violations of antitrust law,
- Violations of European law requirements (e.g. protection of privacy and personal data),

This policy does not cover reports of lawful but somehow "offensive" or "unethical" behaviour by employees. Any reports should be directed to your superior or the responsible compliance officer.

**The material scope of application according to Union Law, Art. 2 EU Whistleblowing Directive 2019/1937/EU. Further specifications of national legislations can be applicable.*