



# Whistleblower Policy for Reporting Corruption and Bribery

(1<sup>st</sup> December 2023, version 2.0)

## COLI's transparency principles

In order to maintain the highest standards of integrity and ethical conduct, COLI encourages transparency and accountability within all the stakeholders in the organization. As part of our dedication to these principles, we want to assure all the employees, contractors, suppliers, and customers of our unwavering support for whistleblowers.

## Purpose and Scope of this policy

The purpose of this procedure is to provide a clear and confidential process for stakeholders, including employees, contractors, suppliers, customers, and other partners, to report any suspected incidents of corruption, bribery, or other unethical conduct.

This procedure applies to all stakeholders who have a relationship with the company and wish to report concerns related to corruption, bribery, or unethical behavior.

## Reporting Channels

COLI's investigation team can be reached through the following channels:

- Email Reporting: Concerns can also be reported via email to [management@coli-shipping.com](mailto:management@coli-shipping.com). The email account is monitored by the management and ensures confidentiality.
- In-Person Reporting: Stakeholders can report concerns directly to the management. Meetings can be arranged in a confidential setting.

## Reporting Guidelines

COLI employees, contractors, suppliers, customers and other partners should report any suspected or actual incidents of:

- Bribery or corruption
- Fraud or embezzlement





- Conflicts of interest
- Violations of company policies related to ethical conduct
- Any other unethical or illegal activities

A detailed description of the incident shall be provided including but not limited to:

- Description of the incident
- Names of individuals involved
- Dates and times
- Supporting documents or evidence (if available)
- Any other relevant information

Reports can be made anonymously, but providing contact information is encouraged to facilitate follow-up. The company will respect the anonymity of whistleblowers who choose to remain unidentified.

### **Protection and Confidentiality**

The company is committed to protecting whistleblowers from retaliation, including dismissal, demotion, harassment, or any form of discrimination. Any form of retaliation against a whistleblower is strictly prohibited and will result in disciplinary action.

All reports and the identity of the whistleblower (if provided) will be kept confidential to the fullest extent possible. Information will only be shared with those necessary to conduct a thorough investigation.

### **Investigation Process**

The management shall monitor and review possible new incidents/complaint relating to suspected incidents of corruption, bribery, or other unethical conduct, pursuant to the following steps:

1. Acknowledgment of Report Upon receiving a report, the management will acknowledge receipt of the report within 3 business days, unless the report is submitted anonymously and no contact information is provided.





2. Initial Assessment: The management will conduct an initial assessment to determine the credibility and seriousness of the report. This may involve preliminary fact-finding to understand the context and scope of the concern.
3. Full Investigation: If the initial assessment indicates a potential violation, a full investigation will be launched. The investigation may involve interviews, document reviews, and consultation with legal or external experts if necessary.
4. Timeliness: The investigation will be conducted promptly and with due diligence. Stakeholders who have provided contact information will be kept informed of the progress and outcome of the investigation, where appropriate.

### **Outcome and Actions**

Upon completion of the investigation, the findings will be reviewed by the management. If the report is substantiated, appropriate corrective actions will be taken and may include disciplinary measures against individuals involved, policy changes, improved internal controls, or legal action if required.

The whistleblower (if known) will be informed of the outcome of the investigation, to the extent that confidentiality and legal considerations allow.

### **Record Keeping**

All reports, investigation details, and outcomes will be documented and securely stored by the Management. Records will be kept for 10 years in compliance with legal and regulatory requirements.

### **Review and Improvement**

Feedback from whistleblowers and stakeholders will be used to improve the reporting process and address any potential gaps in the procedure. This will be reviewed annually or as needed to ensure effectiveness. Updates will be communicated to all stakeholders.



**Contact Information:**

For questions or further information about this policy, please contact:

Management / Board of Directors:

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This whistleblower procedure ensures that stakeholders can report corruption and bribery safely and confidentially, with the assurance that their concerns will be taken seriously and addressed appropriately.

*Version 2.0, 1<sup>st</sup> December 2023*