

Whistleblower

Complying with statutory regulations and internal rules has top priority at **VTXRM**. We can only avoid damaging our company, our employees and business partners if rules and standards are respected. Consequently, misconduct must be recognized swiftly, processed and immediately remedied. Therefore, we entrusted a Central Investigation Office to operate an independent, impartial and confidential Whistleblower system.

It calls for vigilance on the part of everyone, along with a willingness to draw attention to possible serious regulatory violations (SRV's) on the basis of reasonable suspicion. We also value information of this nature from business partners, drivers and third parties. Reports to the Whistleblower System can be made at any time and in any language.

The Whistleblower System guarantees the greatest possible protection for whistleblowers, persons implicated and employees contributing to the investigation of reported misconduct. An investigation is only initiated after very careful examination of the facts and reasonable suspicion of a regulatory violation. There will be strict confidentiality and secrecy throughout the investigative process. Information will be reviewed fairly, promptly and in a sensitive manner.

This includes offering opportunities for anonymous reporting and communication. We assure not to perform any steps in order to identify anonymous whistleblowers, who do not misuse our Whistleblower System. Retaliation of whistleblowers and all persons who contribute to the investigation will not be tolerated. Persons implicated are

presumed innocent until the violation is proven.

Do you have any concern or feedback regarding the **VTXRM** product or service? If you have any questions or inquiries regarding your contract or other services of VTXRM or our business partners, please contact our client´s portal. We kindly ask for your understanding that the Whistleblower System unfortunately cannot process customer complaints.

How do I make a report?

It's important to make sure the information in the report you submit to the Investigation Office, is as concrete as possible, so that it can be processed and investigated in an appropriate manner. It is helpful if your report covers the following five questions:

- Who?
- What?
- When?
- How?
- Where?

Please make sure that any descriptions in your report can be easily understood by persons who are not specialists in your field. It would be helpful if you are available to answer further questions. If you would be willing to do so, but wish to remain anonymous to the company, please contact the ombudspersons to make your report. However, this does not affect the statutory right to contact designated authorities.

Where do I send my report?

Please send your report directly via our contact points for the Whistleblower System of **VTXRM**.

Via e-mail: compliance@vtxrm.com

or post:

Compliance Team
Tagus Park – Edifícios Qualidade
Av. Prof. Dr. Cavaco Silva, Bloco B 3 – 1º e 2º Andar
2740-296 Porto Salvo
Portugal

External Reporting Channels of Portugal

The Portugal government has defined designated authorities, that also accept reports on misconduct as external reporting channels. The external reporting channel/s is/are:

The Public Prosecutor's Office (dciap@pgr.pt)

- Criminal Police Bodies-
- The Bank of Portugal-
- Independent administrative authorities
- Public institutes;
- The Inspectorates
- General and similar entities and other central services of the direct administration of the State endowed with Administrative autonomy;
- Local authorities; and- Public associations.

Do you have any further questions?

Questions concerning the Whistleblower System of **VTXRM** can also be addressed to our local compliance team via email: compliance@vtxrm.com.