Whistleblowing and Ethics Reporting Policy

Group policy

xstreco

Contents

Approved by	The Board of Directors of Xstreco AG
Issued by	Executive management
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Version	2.1

1 Introduction

1.1 Purpose and Scope

1.1.1 Purpose of the Policy

This policy sets out how concerns about breaches of the Code of Conduct, of Group policy or of the law may be raised, how they are handled, and the protection available to those who raise them.

1.1.2 Scope and Applicability

A concern may be raised under this policy by anyone, including current and former employees, directors, officers, contractors, job applicants, suppliers, customers and members of a community affected by the Group's activities. The obligations in section 4 apply to employees, directors, officers and contractors under Xstreco's direct supervision; everyone else may use the channels in section 5.1 but, save where a contract with the Group so provides, is under no obligation to do so. Where the Group holds an interest in a joint venture that it does not control or operate, it uses its influence to encourage conduct consistent with this policy.

2 Policy Statement

2.1 Group's Stance on Whistleblowing and Ethics Reporting

Retaliation against a person who raises a concern in good faith is prohibited. Reports must be taken seriously, assessed promptly and impartially, and handled so that the identity of the person raising the concern is treated as confidential and is not disclosed except where disclosure is required by law or is necessary for the investigation, and then only to the extent necessary. Reporting channels must be designed and operated so as to protect the confidentiality of what is submitted and of the person submitting it, and a concern raised without a name must be assessed in the same way as one raised with a name.

2.2 Legal Implications

Switzerland has no general whistleblower protection statute. Protection rests on the Code of Obligations, in particular Article 328 on the protection of the employee's personality and Articles 336 and 336a on abusive termination, read with the duty of loyalty in Article 321a. In Peru, dismissal for presenting a complaint or taking part in proceedings against the employer before the competent authorities is null under the labour legislation; a reporting channel and the protection of the person reporting are elements of the prevention model under Ley N.° 30424, as amended, and its reglamento; and Ley N.° 29542 and Decreto Legislativo N.° 1327 protect those who report acts of corruption in the public administration. This policy is structured against ISO 37002, which is guidance and not certifiable, and against the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, which are recommendations to enterprises and not binding law. Non-compliance with this policy, and the conduct it prohibits, may result in reputational damage, legal penalties, and internal disciplinary action.

3 Key Principles and Guidelines

3.1 Specific Principles or Guidelines

This policy requires the following principles to be applied:

(a) Protected Disclosures: Reports may include suspected fraud, corruption, harassment, discrimination, safety violations, data breaches, or any breach of the Code of Conduct, of Group policy or of the law.

(b) Reporting Without a Name: A concern may be raised without giving a name or contact details, and is assessed in the same way. A report made through the web form is not technically anonymous, because the Group's website provider records basic technical data with every submission; a report sent by post can be. Where a name is not given, the Group can only follow up if the person raising the concern provides a means of contact.

(c) Confidentiality: The identity of the person raising the concern and the details of the report are treated as confidential and are not disclosed except where disclosure is required by law or is necessary for the investigation, and then only to the extent necessary.

(d) Impartial Investigation: Every concern is assessed, and where it requires investigation it is investigated fairly, without bias and without conflict of interest, by a person with no involvement in the matter.

(e) Acknowledgement and Closure: Where the person raising a concern has provided a means of contact, receipt is acknowledged and the person is informed when the matter has been closed, so far as the law and the confidentiality of others allow. No commitment is made as to the outcome of an investigation.

(f) Retaliation Protection: Retaliation against a person who raises a concern in good faith, takes part in an enquiry into one or refuses to engage in unethical or unlawful conduct is prohibited and is subject to disciplinary action. A report made in the knowledge that it is false is itself a breach of this policy; a report made in good faith that proves to be unfounded is not.

3.2 Examples and Applications

(a) Reporting Fraud: An employee reports falsified financial records. The concern is assessed and, where it requires investigation, investigated, and corrective action is taken where the report is substantiated.

(b) Retaliation Case: An employee is demoted after raising a concern. The matter is assessed and, where it requires investigation, investigated and, where retaliation is established, remedied.

(c) Misuse of Group Resources: A contractor reports unauthorised use of Group funds. The matter is escalated, assessed and, where it requires investigation, investigated.

(d) Report Without a Name: A supplier raises a concern about procurement practice without giving a name. The concern is assessed on the same basis as one raised with a name and, where it requires investigation, investigated so far as the information given allows.

4 Roles and Responsibilities

4.1 The Board

Oversight of this policy rests with the board. The board approves this policy and each revision of it.

4.2 Executive Management

Executive management issues this policy, provides the means required to apply it, and is accountable to the board for its application. Where this policy requires a matter to be escalated, it is escalated to executive management.

4.3 Responsibility for This Policy

Responsibility for the day-to-day application of this policy is assigned within the Group. This policy requires that the assignment be recorded in the Schedule of Policy Assignments, an internal document, be kept current, and be made known to those subject to this policy. Where this policy refers to the compliance function, it means the person or persons holding that assignment at the relevant time, whether or not a separate department exists.

4.4 Those Who Direct the Work of Others

Anyone who directs the work of others is responsible for applying this policy in the work they direct, for making those they direct aware of it, and for passing on a concern raised with them.

4.5 Everyone Subject to This Policy

Everyone subject to this policy must comply with it, must raise a concern where they believe it has been or may be breached, and must co-operate with any enquiry into such a concern.

4.6 Counterparties

Counterparties must meet the standards in this policy where their contract with the Group so provides, and may raise a concern through the channels in section 5.1.

4.7 Those Responsible for Handling a Concern

A concern raised under this policy is assessed and, where it requires investigation, investigated by a person who has no involvement in the matter and no conflict of interest in relation to those involved in it. Where no such person is available within the Group, a person from outside it is appointed. The person handling the concern is responsible for keeping the record of what was raised, what was done and what was decided.

5 Reporting and Monitoring

5.1 Reporting Mechanisms

5.1.1 Internal Reporting

A concern under this policy may be raised with a line manager, with any member of executive management, or with the compliance function. A concern may also be raised through the web reporting form at xstreco.com/report, by writing to compliance@xstreco.com or codeofconduct@xstreco.com, both of which reach the compliance function, or by telephone on +41 41 562 32 90, asking for the compliance function. Retaliation against a person who raises a concern in good faith is prohibited.

5.1.2 External Reporting

A person who is not employed by the Group may raise a concern through the web reporting form at xstreco.com/report, by writing to compliance@xstreco.com or codeofconduct@xstreco.com, by telephone on +41 41 562 32 90, or by post, marked 'Confidential - Compliance', to the address at the end of this document. A concern may be raised in English or in Spanish. A name and contact details are not required, and a concern raised without them is assessed in the same way. The Group's website provider records basic technical data with every submission, so a report made through the form is not technically anonymous, and a call is not anonymous; a report sent by post can be.

5.2 Monitoring Procedures

This policy requires that its application be kept under review, and that a record sufficient to show how it has been applied be kept. In particular, this policy requires:

(a) that compliance with this policy be reviewed on the cycle stated in section 8;

(b) that concerns raised under this policy, and the way in which each was resolved, be recorded;

(c) that the risk this policy addresses be reassessed whenever the Group's activities change materially;

(d) that matters which are unresolved, which recur, or which are systemic be escalated to executive management and, where the law requires it or it is otherwise appropriate, to the competent authorities;

(e) that those subject to this policy be able to demonstrate, from the records kept, that its requirements were met.

The means used to meet these requirements are proportionate to the size of the Group and to the scale and nature of its activities at the time, and are extended as those change.

6 Training and Awareness

6.1 Awareness on Appointment

This policy requires that everyone subject to it be made aware of it on appointment and be given the instruction needed to apply it in their role. The form and the depth of that instruction are proportionate to the role.

6.2 Continuing Awareness

This policy requires that awareness of it be refreshed on the cycle stated in section 8, and whenever the policy is revised or an event makes it necessary, and that those in roles carrying greater exposure to the risk this policy addresses receive instruction appropriate to that exposure.

7 Compliance and Consequences

7.1 Reporting Non-Compliance

Everyone subject to this policy must report suspected violations, as must counterparties where their contract with the Group so provides. The identity of the person making a report is treated as confidential and is not disclosed except where disclosure is required by law or is necessary for the enquiry, and then only to the extent necessary. Retaliation against a person who reports in good faith is prohibited.

7.2 Consequences of Non-Compliance

Violations may result in disciplinary action, including termination of employment or contract, and may trigger legal proceedings.

8 Review and Revision

8.1 Review Frequency

8.1.1 Review Cycle

This policy is reviewed at least once in every two calendar years.

8.1.2 Event-Triggered Review

A review is carried out, whether or not one is due under the cycle, whenever a change in the law, a material change in the Group's activities, or an event arising under this policy makes one necessary.

8.1.3 Conduct and Outcome of the Review

The review is carried out by the holder of the responsibility described in section 4.3. Its outcome is submitted to the board, and any revision resulting from it is approved by the board before issue.

8.2 Revision History

8.2.1 Version 2.1 - 01.09.2026

Approved by the board and issued by executive management following a scheduled review of the suite. The amendments are editorial and clarifying; the policy positions stated in version 2.0 are unchanged.

8.2.2 Version 2.0 - 01.01.2026

Approved by the board and issued by executive management, replacing the first issue.

8.2.3 Version 1.0 - 02.06.2025

First issue.

8.2.4 Superseded Versions

Superseded versions are retained. Each revision is communicated to those subject to this policy.

9 Appendices

9.1 Glossary of Terms

(a) Whistleblower: A person who reports a concern about a breach of the Code of Conduct, of Group policy or of the law.

(b) Retaliation: Any detriment, actual or threatened, suffered because a person raised a concern in good faith, took part in an enquiry into one or refused to engage in unethical or unlawful conduct.

(c) Protected Disclosure: A report that qualifies for protection under this policy and under any applicable law.

(d) Confidentiality: The safeguarding of the identity of the person raising a concern and of the details of the report, which are not disclosed except where disclosure is required by law or is necessary for the investigation, and then only to the extent necessary.

(e) Impartial Investigation: The investigation of a concern, where its assessment shows that one is required, conducted fairly and without bias by a person who has no involvement in the matter and no conflict of interest in relation to those involved in it.

9.2 Related Legislation

9.2.1 Local Legislation

In Switzerland, there is no general whistleblower protection statute. The Code of Obligations applies, in particular Articles 321a, 328, 336 and 336a. In Peru, there is no general whistleblower protection statute for the private sector. The Texto Único Ordenado del Decreto Legislativo N.° 728, approved by Decreto Supremo N.° 003-97-TR (nullity of dismissal for presenting a complaint or taking part in proceedings against the employer before the competent authorities), Ley N.° 30424, as amended, and its reglamento, approved by Decreto Supremo N.° 002-2019-JUS, as amended (reporting channel and protection of the person reporting as elements of the prevention model), and Ley N.° 29542 and Decreto Legislativo N.° 1327 (protection of those who report acts of corruption in the public administration) apply.

9.2.2 International Standards and Frameworks

(a) ISO 37002:2021: Guidance on whistleblowing management systems. It is not certifiable.

(b) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: Recommendations to enterprises.

"Xstreco's policies set the standards that govern how the Group conducts its activities and how that conduct is assessed."

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