

GRIEVANCE AND WHISTLEBLOWING PROCEDURE

Safe reporting, confidentiality, impartial review and protection from retaliation

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Assessment scope: Aurum Logistic sp. z o.o., KRS 0001015587, NIP 6342925738, REGON 369697239; registered office: ul. gen. Józefa Longina Sowińskiego 46, 40-018 Katowice, Poland.

Aurum Logistic encourages employees, contractors, carriers and other stakeholders to raise concerns in good faith. Reports are handled confidentially and no person may suffer retaliation for making a report or participating in a review.

1. Scope

This Procedure is a public description of the Company's grievance and whistleblowing mechanism. It covers employees, former employees, candidates, drivers, B2B contractors, carriers, suppliers, customers and other persons who obtained information in a work-related context.

Where applicable law requires a more detailed internal procedure or provides stricter rights, deadlines or safeguards, the applicable law and formally adopted internal procedure prevail.

2. Matters that may be reported

- Bribery, fraud, conflicts of interest, unfair competition, sanctions breaches or financial misconduct.
- Human-rights, employment, discrimination, harassment, bullying, forced labour or other workplace concerns.
- Health and safety hazards, road-safety issues, driver-hours breaches, cargo-security or quality concerns.
- Environmental harm, excessive emissions, spills, waste-management failures or other environmental non-compliance.
- Data-protection, confidentiality, cybersecurity or misuse of Company information or assets.
- Retaliation, concealment of evidence or attempts to obstruct a report or investigation.



3. Reporting channels

Channel	How to report
Email	compliance@aurumlogistic.eu
Written report	Aurum Logistic sp. z o.o., ul. gen. Józefa Longina Sowińskiego 46, 40-018 Katowice, Poland; mark the envelope 'Confidential - Whistleblowing'.
Direct report	Report to the President of the Management Board, the Director of Transport and Forwarding, or a line manager.
Conflict route	If the normal recipient is implicated or cannot act impartially, the matter must be transferred to a non-conflicted authorised person or independent adviser designated by the Management Board.

Reports may be anonymous. A reporter is not required to prove the matter before reporting, but should provide information believed to be true and as much detail as reasonably available. Knowingly false reports are not protected.

4. Handling process

Receipt and acknowledgement

The report is logged securely and screened for immediate safety, environmental, data-protection or evidence-preservation needs. Where contact details are available, receipt is acknowledged within 7 days.

Initial assessment and assignment

The Company assesses scope, urgency, conflicts of interest and the appropriate reviewer. Only authorised persons with a legitimate need to know receive access. A reviewer must be impartial and sufficiently competent.

Review and follow-up

The reviewer may examine documents, interview relevant persons, preserve evidence and obtain specialist support. The person affected by allegations is treated fairly and information is disclosed only when lawful and necessary.

Feedback and closure

Where contact details are available, feedback on follow-up actions is provided within 3 months of acknowledgement, subject to legal and confidentiality limits. The case is formally closed when actions and required records are completed. Corrective, preventive, disciplinary or contractual measures are tracked to completion.

5. Confidentiality, data protection and records

- The reporter's identity and information that could reveal it are protected and disclosed only where authorised by law or with the reporter's consent.

- Personal data are limited to what is necessary, secured against unauthorised access and handled in accordance with the GDPR and applicable national law.
- The register records at least the case number, subject, date, contact data where provided, persons concerned, follow-up action and closure date.
- Data and other information in the internal-report register are retained for 3 years after the end of the calendar year in which follow-up action was completed, or after proceedings initiated by those actions were completed, unless a different lawful period applies.
- Acronyms or other data-minimising identifiers are used in working records where appropriate and consistent with the Company's data-protection approach.

6. Non-retaliation

Dismissal, demotion, intimidation, harassment, discrimination, unfavourable scheduling, unjustified contractual disadvantage, threats and other retaliatory action are prohibited. A person who believes retaliation has occurred should report it immediately. Retaliation is treated as a separate serious breach.

7. External reporting

Where the Polish Act of 14 June 2024 on the Protection of Whistleblowers applies, an eligible person may report externally to the Ombudsman or the competent public authority without first using the internal channel. Information on current external channels is available from the relevant public authorities.

8. Monitoring and responsibility

- The Management Board provides oversight and designates authorised recipients and reviewers.
- The designated case owner safeguards the register, deadlines, confidentiality and follow-up records.
- The Director of Transport and Forwarding supports operational investigations where no conflict exists.
- Outsourced HR or specialist support may assist under confidentiality, data-protection and conflict-of-interest controls; accountability remains with Aurum Logistic.
- Effectiveness is reviewed at least annually using case volumes, categories, response times, corrective actions and any identified retaliation risks.

Approval record

This document becomes effective when approved for issue by the Director of Transport and Forwarding. The signed approval record should be retained by the Company.

Approver Wojciech Pielok Director of Transport and Forwarding	Approval date: 30/02/2024 Signature: _____
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