

WHISTLEBLOWING SYSTEM AS Riga Port

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1. Terms

- 1.1. **Parent company or RP** - AS "Riga Port", registration No 40103523241;
- 1.2. **Subsidiary** - a corporation whose entire share capital is owned, directly or indirectly, by the Parent company;
- 1.3. **Group** - the collection of Parent and Subsidiary companies;
- 1.4. **Company or Group company** - RP or Subsidiary;
- 1.5. **Riga Port Management** – Subsidiary Company Limited Liability Company "Riga Port Management", Single Registration No.40103353827, registered office in Riga, Eksporta iela 15 k-1, LV-1045.
- 1.6. **Employee** - a natural person who performs employment, professional or official duties or provides services in a Group company (e.g. employee, job interview candidate, service provider, trainee, member of the Management Board, Supervisory Board, member, etc.).
- 1.7. **Management** - Boards of the Group companies.
- 1.8. **Misconduct** - a criminal offence, administrative offence or other breach of a legal provision or of binding ethical or professional standards.
- 1.9. **Whistleblower Contact Point or Contact Point** - Riga Port Management, who is the whistleblowing officer of the Group.
- 1.10. **Whistleblower** - An Employee who provides information about a possible Violation in the Company, in its territory, which may harm the public interest, if the Employee considers this information to be true and the information was obtained in the performance of his/her

work, professional or official duties or services in a Group company or by establishing a legal relationship with an RP Group company.

- 1.11. **Associated person** - a natural person who supports or assists the whistleblower in whistleblowing or is associated with the whistleblower and could suffer negative consequences. An associated person may be a colleague of the whistleblower or an employee, relative or family member of the client or business partner;
- 1.12. **Whistleblower Report** - information provided by a Whistleblower about a possible Violation that may harm the public interest, if the Employee considers this information to be true and it has been obtained in the performance of his/her employment, professional or official duties or services in a Group company or by establishing a legal relationship with an RP Group company.
- 1.13. **Responsible Person** - The persons designated by the Contact Point to be responsible for receiving Employee submissions in the form of Whistleblower Reports (including processing if the Whistleblower Report is made orally), registering, pseudonymising the data in the Whistleblower Report and advising on whistleblowing options within the Group and on matters related to submitted Whistleblower Reports are the Head of Human Resources of Riga Port Management, the Head of Quality of Riga Port Management and the Head of Legal Department of Riga Port Management.

2. Regulatory enactments

- 2.1. Whistleblowing Law (current wording), hereinafter - the Law.
- 2.2. the guidelines on the trauksmesceļs.lv website:
 - 2.2.1. guidelines for setting up an internal whistleblowing system;
 - 2.2.2. guidelines for handling whistleblower reports.

3. General

- 3.1. The main principles of a whistleblowing system:
 - 3.1.1. Promotion of whistleblowing - whistleblowing in good faith about possible wrongdoing in the Group's business is encouraged and promoted, not discouraged;
 - 3.1.2. Non-disclosure of the Whistleblower's identity - The Whistleblower can feel safe - The Whistleblower Contact Point does not disclose the identity of the Whistleblower;
 - 3.1.3. Fair and responsible reporting - The Whistleblower shall report the alleged Misconduct in good faith, without accepting responsibility for the veracity of the information provided, but shall make a responsible and fair assessment of its truthfulness and reliability, i.e. the Whistleblower shall evaluate the information to be reported and shall, to the extent possible, verify that the information provided is truthful;
 - 3.1.4. Zero-tolerance of repressions and protection - the Whistleblower, his relatives and associated persons should not be subjected to reprisals or stigmatising treatment because he has blown the whistle in accordance with the requirements of the Whistleblowing Law. The Whistleblower, their relatives and associated persons are entitled to protection against the adverse consequences of whistleblowing;
 - 3.1.5. Accessible Whistleblowing system - The document is available on the Group's intranet "OSTA" document database, at Riga Port Management Human Resources Department and published on the website www.rigaport.lv . At the same time, easy-to-understand information on whistleblowing opportunities within the Group is posted in the premises of Group companies employing more than 50 Employees (see Appendix 2).

- 3.1.6. Whistleblower reports are evaluated - they are recorded and evaluated responsibly. If Misconduct is discovered, appropriate action will follow;
- 3.1.7. Feedback - The Whistleblower receives confirmation and information on the progress of the Whistleblower Report.
- 3.2. The tasks of the Whistleblower Contact Point are:
 - 3.2.1. receive and register Employees' submissions in the form of Whistleblower Reports, as well as process Whistleblower Reports received verbally;
 - 3.2.2. to assess the prima facie compliance of the information provided in the Employee's application, which has been prepared as a Whistleblower's Report, with the elements of whistleblowing set out in the Whistleblowing Law;
 - 3.2.3. pseudonymise the personal data provided in the Whistleblower Report;
 - 3.2.4. respond to the Employee on whether or not his/her application has been accepted as a Whistleblower Report;
 - 3.2.5. inform the Whistleblower about the progress of the Whistleblower Report;
 - 3.2.6. if necessary, make other contact with the Whistleblower;
 - 3.2.7. advising on Whistleblowing options within the Group and on issues related to Whistleblower reports;
 - 3.2.8. keep Whistleblower Reports and all information relating to their progress and the decisions taken.

4. Preparing, submitting a Whistleblower Report

- 4.1. The whistleblowing system set up in RP Group companies can be used to provide information:
 - 4.1.1. arising out of or in connection with the performance of the work, or the work after it has been carried out, e.g. for breaches of the Rules of Procedure, labour protection, fire safety, environmental protection, work technology;
 - 4.1.2. breach of general ethical norms and legal provisions;
 - 4.1.3. environmental safety and public health risks;
 - 4.1.4. transport safety offences;
 - 4.1.5. protection of privacy and personal data;
 - 4.1.6. construction safety hazards;
 - 4.1.7. and other cases referred to in Section 3 of the Whistleblowing Law.

Examples:

Personal protective equipment is not issued to Employees when they carry out hazardous work, posing risks to their health and life.

The Employee has noticed during the course of his work tasks that fire extinguishers are not provided in the Company, posing risks of uncontrolled fire hazards that could endanger the health and lives of Employees.

The employee has noticed that household waste is being dumped into the Daugava River, polluting the surrounding environment.

The Employee is required to carry out a work task using machinery that is not in a roadworthy condition, posing risks to the life and health of the Employee and his/her colleagues.

- 4.2. If you have any doubts about the validity of submitting a Whistleblower Report, you can seek advice from the Contact Point before submitting a Whistleblower Report.

4.3. The Whistleblower Report (Annex 1) shall be submitted to the Contact Point in one of the following ways:

4.3.1. by handing it to the Responsible Person (if the Whistleblower's report is given verbally, it is written down by the Responsible Person after it has been presented and confirmed by the Whistleblower):

*Eksporta ielā 15 k-1, Rīga
(Head of Human Resources on the 1st floor, Head of Legal Department and Head
of Quality Department on the 2nd floor)
Weekdays 9:00-12:00 and 13:00-16:00*

4.3.2. by sending to the Contact Point at the address specified in Section 5.3.2 or by hand-delivery to the Riga Port Management post box at the address specified. In this case, it is advisable to clearly and unambiguously state before the text of the report that it is a Whistleblower Report.

*For example, put the report in a separate envelope or folder marked
"Whistleblower Report", or write "Whistleblower Report" before the report on a
separate white sheet;*

4.3.3. by sending a completed Whistleblower Report Form (Annex 1) or a Whistleblower Report in free form to the e-mail address trauksme@rigaport.lv, in accordance with Section 5.4 of the Document (Whistleblower Reports sent to the specified e-mail address are received by the Responsible Persons).

ATTENTION! *If the Whistleblower has reason to believe that reporting to the Contact Point (using the whistleblowing system described in the Document) may endanger themselves, their family members or associated persons, or for any other reason it is not effective to report to the Company, the Whistleblower's report may be submitted to the trade union, the Society for Openness - Delna, the State Chancellery, or any other state institution competent to respond to the alleged Misconduct identified in the Whistleblower Report. More information is available at <https://trauksmescelejs.lv/>.*

4.4. The Whistleblower Report shall be prepared by completing the Whistleblower Report Form attached as Annex 1 to the Document or in free form, indicating the information referred to in Sections 5.4.1 to 5.4.4 of the Document. The Whistleblower when preparing the Whistleblower Report shall:

4.4.1. make a good faith assessment of the information it will include in the report and, as far as possible, ensure that the information provided is correct, minimising the scope for error. Providing false information is not whistleblowing and may be punishable under the laws and regulations;

4.4.2. describe in as much detail as possible the details of the alleged Misconduct, mentioning the facts and circumstances that prove it (date, place of the alleged violation), the natural persons (names, surnames, titles) or legal entities involved, indicate whether the Whistleblower has any evidence (documents, photographs, e-mail correspondence) and, if so, attach it to the Whistleblower Report;

4.4.3. the potential damage to the interests of the public or of the Group company (reporting only the damage to personal interests does not constitute whistleblowing);

4.4.4. provide personal data - name, surname, personal identification number, contact information for communication (e-mail, telephone), as well as the Group company where the Whistleblower is an Employee or with which of the Group companies he is affiliated. As this information provided is highly protected, its further disclosure after receipt by the Contact Point is prohibited.

ATTENTION! *In cases where the Whistleblower Report does not contain the personal data of the Whistleblower and is submitted anonymously, the relevant Report may be dealt with to the best of the person's ability and the person will not*

be afforded the protections of the Whistleblowing Law and will not be provided with the information set out in Sections 4.2.4 to 4.2.5 of the Document.

5. Recording, anonymising, evaluating a Whistleblower Report

- 5.1. The Employee's submission, which is formatted as a Whistleblower Report:
- 5.1.1. The Responsible Person shall record the Whistleblower Report in the Whistleblower Register by assigning it an identification number and indicating the date of receipt of the Whistleblower Report, the Group Company where the Whistleblower is an Employee or related to it. If received electronically, print the Employee's application as received and then delete it from the email.
 - 5.1.2. The responsible person anonymises the report by making personal data illegible, invisible;
 - 5.1.3. The Contact Point shall assess the prima facie compliance with the whistleblowing characteristics set out in the Whistleblowing Law and send a letter to the Employee within 10 (ten) working days of receipt of the Employee's application regarding the recognition/non-recognition of his/her application as a Whistleblower Report.
 - 5.1.3.1. In the event that the Contact Point has deemed the Employee's submission to be a Whistleblower Report, the Contact Point shall immediately forward an anonymised copy of the Whistleblower Report to the Board of the Group Company where the Whistleblower is employed or associated for consideration on its merits.
 - 5.1.3.2. In the event that the Contact Point has not recognised the Employee's application as a Whistleblower Report and the Employee in the application:
 - 5.1.3.2.1. has indicated that he/she wishes his/her submission to be treated as a submission by a natural person, the Contact Point shall forward the submission to the Board of the Group Company for registration as a submission by a natural person;
 - 5.1.3.2.2. has indicated that he does not wish his application to be treated as that of a natural person, shall deposit the Employee's application in the place specified in the Document;
 - 5.1.3.2.3. has not indicated whether he/she wishes his/her application to be considered as an application by a natural person, the Contact Point shall send a request to the Employee to inform whether he/she wishes his/her application to be considered as an application by a natural person;
 - 5.1.4. The Responsible Persons shall keep the Whistleblower Report in a place to which only the Responsible Persons have access.
- 5.2. The Board of Directors of the Group Company shall, immediately upon receipt of an anonymised Whistleblower Report, appoint a responsible person or establish a committee (hereinafter referred to as the "Committee") to consider the substance of the Whistleblower Report, taking into account the contents of the Whistleblower Report.
- 5.3. The Committee shall conduct a responsible, thorough and impartial assessment of the merits of the Whistleblower Report within three (3) months (but not more than six (6) months) from the date of receipt of the Whistleblower Report and report the results of the assessment of the Whistleblower Report to the Board of Directors of the relevant Group Company. The Commission shall call in specialists if, for objective reasons, it does not have the competence to assess the matters set out in this paragraph.

- 5.4. The Board of Directors of the Group Company shall, immediately upon receipt of the Commission's report, decide on the follow-up action to be taken in relation to the Whistleblower Report, specifying the action to be taken (if any), the person responsible and the deadline for the action to be taken.
- 5.5. The Board of Directors of the Group company, after taking a decision on the follow-up of the Whistleblower Report, is obliged to forward the decision and the Commission's report to the Contact Point.
- 5.6. The Contact Point shall have the right to request, and the Board of Directors of the Group Company shall be obliged to provide, without delay, the Contact Point with all information related to the progress of the Whistleblower Report and the implementation of the decisions taken by the Board of Directors of the Group Company.
- 5.7. The Contact Point shall inform the Whistleblower within 3 (three) months (but no later than within 6 (six) months) of receipt of the Whistleblower Report of the progress of the Whistleblower Report and shall provide the information received from the Board of Directors of the Group Company on the decision taken on further action in relation to the Whistleblower Report.

6. Storage, destruction of whistleblower reports

- 6.1. All documented information related to the Whistleblower Report (including personal data) shall be collected and stored by the Contact Point for 5 (five) years after the Whistleblower Report has been reviewed on its merits and the actions specified in the decision of the Board of Directors of the Group company have been completed.
- 6.2. The Contact Point shall keep at least:
 - 6.2.1. the original Whistleblower Report, if received in paper form, and a printout, if received electronically (also stored are Employees' submissions that are formatted as Whistleblower Reports but are not recognised as such if the Employee has indicated in the submission that they do not wish the submission to be treated as a submission by a natural person);
 - 6.2.2. copies of letters sent by the Contact Point to the Whistleblower/Employee;
 - 6.2.3. the original of the Commission's report on the results of the assessment of the Whistleblower Report;
 - 6.2.4. the original decision of the Board of Directors of the Group Company on the follow-up to the Whistleblower Report;
 - 6.2.5. Information from the responsible officer on the implementation of the actions (if any) set out in the resolution of the Board of Directors of the Group Company.
- 6.3. After the expiry of the retention period, the Contact Point shall transfer the information related to the Whistleblower Report for confidential destruction to the cooperation partners by means of a document destruction act or shall destroy the documents independently by means of a document destruction act.

7. Final provisions

- 7.1. Version 02 of the document shall enter into force upon approval by the Board of Riga Port AS, accordingly version 01 of the document shall cease to be valid at that time.
- 7.2. The Quality Manager shall electronically notify the members of the Board of the publication of the document on the Intranet.
- 7.3. The requirements described in the document remain unchanged by changes in the names and/or functions of the Companies, business units and/or functions.
- 7.4. The Quality Manager oversees compliance with the requirements of the document.

- 7.5. The Whistleblower Reporting Form attached as Annex 1 shall be maintained by the Quality Manager of the Contact Point.
- 7.6. Suggestions for amendments and additions should be sent to the document's author. If necessary, the document shall be amended by the drafter and an updated version shall be submitted for approval.
- 7.7. Document status and history of previous versions:

COMPANY TO BE REPORTED
1. DESCRIPTION OF THE MISCONDUCT

Provide the information you have about the alleged misconduct. Provide specific facts or circumstances that suggest this (e.g. date, place where the alleged infringement was observed), natural or legal persons involved, positions of the persons involved. Please indicate whether you have any evidence (e.g. documents, photos, e-mail correspondence).

2. YOUR RELATIONSHIP TO THE RIGA PORT GROUP COMPANY WHERE THE ALLEGED INFRINGEMENT OCCURRED

(MARK AS APPROPRIATE)

- I work for the company I am reporting on (I have a contractual relationship/job/employment relationship with it)
- I am performing my duties for the company I am reporting on, but have no contractual relationship with it (e.g. I provide a service but have a contract with another organisation)
- I provide a service to the company I report on
- I observed the alleged infringement at the time the legal relationship was established
- other relationship (specify) _____

3. INDICATE WHAT HARM (IF ANY) TO THE PUBLIC INTEREST¹ AND TO WHICH MEMBERS OF THE PUBLIC THE ALLEGED INFRINGEMENT HAS CAUSED OR IS LIKELY TO CAUSE

¹ Reporting infringement of only personal interest does not constitute whistleblowing.

4. ATTACHMENT

Please indicate the documents attached to the report that you believe confirm the alleged infringement. If you have indicated that you have previously reported this ethics violation, please attach the response, if any

- 1.
- 2.
- 3.
- ..

5. DETAILS OF THE APPLICANT

Full name, personal identity number

Contact details (email, phone number, details of where to contact you, including how to send a reply)

6. DATE OF SUBMISSION

By submitting a whistleblower report, I

- agree to the processing of my personal data (in accordance with the Whistleblowing Law for registration of the report, verification of the information provided, review of the report and re-contact with me) and I am informed that the data controller is SIA "Riga Port Management", registration No.40103353827, address: Eksporta iela 15 k-1, Riga.
- declare that I believe the information in the report to be true
- am aware that I may be held liable for knowingly providing false information as provided for in the laws and regulations

If my report is not considered a whistleblower report:

- 1) I agree to my report being considered as an application from a natural person
(this means review by general procedure without any protection guarantees)
- 2) I do not agree to my report being considered as an application by a natural person

_____ (signature)

Completed by the Responsible person

Date of registration of the report _____ No. _____

INFORMATION ON FURTHER COMMUNICATION:

- Within 10 (ten) working days of receipt and once a decision has been taken to accept/disregard your application as a Whistleblower Report, a reply will be sent to you (using the contact details provided in section 5 of your report) informing you of the decision taken;
- if you need further information to investigate the Whistleblower Report, you will be contacted;
- if your application is deemed to be a Whistleblower Report, the Riga Port Contact Point will inform you of the status of the application within three months of the date on which your application was deemed to be a Whistleblower Report;
- In case of any doubts, you can contact the Riga Port Contact Point by e-mail: trauksme@rigaport.lv

**RAISE THE ALARM IF YOU SEE SOMETHING IN YOUR WORKPLACE
THAT RAISE SUSPICIONS OF POSSIBLE WRONGDOING
THAT COULD HARM THE PUBLIC INTEREST**

RAISE THE ALARM ABOUT THE FOLLOWING:

- omissions, negligence or abuse of position by officials/employees
 - corruption
 - fraud
- misappropriation of funds or property
 - tax evasion
 - risks to public health
 - construction safety hazards
 - environmental safety hazards
 - occupational safety hazards
 - threat to public order
 - human rights violations
 - violations in procurements
- violations in the financial and capital market sector
 - infringement of competition law

HOW TO RAISE THE ALARM?

Use Online Whistleblower Message Form: www.rigaport.lv	Send message via e-mail: trauksme@rigaport.lv
Drop your message in the mailbox at 15 k-1 Eksporta Street, Riga with marking: Whistleblower Message	Send your message to postal address: 15 k-1 Eksporta Street, Riga with marking: Whistleblower Message

More information [ABOUT RP WHISTLEBLOWER SYSTEM] and Whistleblower Message Form, how to complete and send it:

www.rigaport.lv

HR office

15 Eksporta Street, Building 1, Riga