

GRIEVANCE MECHANISM ECOCHAIN TECHNOLOGY B.V.

Confidential - Version 1 - February 2025

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Document Owner: Ecochain's Ethical Committee

Introduction to grievance mechanism:

Ecochain Technologies B.V. is committed to transparency and accountability in all its operations. We provide external stakeholders clear channels to raise grievances and ensure a structured, fair, and timely resolution process. This policy outlines how grievances can be submitted, processed, and resolved while ensuring protection against retaliation (more about this in Ecochain's *Whistleblower Protection Policy*).

Grievance submission channels:

Ecochain Technologies B.V. offers a means for external stakeholders to contact us regarding grievances. The dedicated grievance email address is listed on our <u>website's contact page</u>: grievance@ecochain.com.

Employees and contractors have an additional avenue for submitting grievances. Requests can be directed to Frans-Willem de Kloet (CEO) or the Chair of the Ethical Commission, who will review the matter and, if necessary, involve the commission. Ecochain's external trust officer is also available as a confidential contact for those who prefer to submit a grievance anonymously.

- The Ethical Commission is a point of contact for ethical concerns
 - **Ethical committee:** grievance@ecochain.com
 - CEO: Frans-Willem de Kloet <u>fwdkloet@ecochain.com</u>
 - Dedicated confidential officer: Maarten Dunhof maarten.dunhof@arboned.nl,
 +316 14241641 (this contact option is exclusively available for independent contractors)

Grievance process:

Upon receiving a grievance, the CEO and the Ethical Commission provide the stakeholder with information on our grievance process, which includes:

- **Grounds for accepting a grievance**: Grievances must relate to Ecochain's business practices, ethical considerations, environmental impact, or stakeholder interactions. Examples include, but are not limited to:
 - Violations of Ecochain's ethical, environmental, or corporate policies (e.g.
 Whistleblowing policy and Anticorruption policy)
 - Unethical business practices or partnerships



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- o Environmental concerns related to Ecochain's operations
- o Workplace discrimination, harassment, or other serious misconduct
- o Improper or unfair business dealings that negatively impact external stakeholders
- **Grounds for rejecting a grievance**: Grievances may not be accepted if they:
 - o Do not relate to Ecochain's operations, policies, or business practices;
 - Have insufficient detail or supporting evidence to warrant an investigation;
 - Concern personal disputes unrelated to professional or business matters.

Grievance process steps & targeted deadlines:

- Acknowledgment of receipt within five business days from the CEO or our external Trust officer;
- Initial review and determination of whether the grievance is valid within fifteen business days;
 This will be decided during an ad-hoc meeting with the Ethical Commission and CEO and/or external trust officer;
- Investigation and resolution process within thirty business days, if applicable.

Resolution facilitation:

Whenever possible, the CEO and the Ethical Commission will work with the stakeholder to resolve the grievance amicably and fairly.

- Once the investigation is complete, Ecochain Technologies B.V. will work towards a fair resolution in line with company policies and ethical standards.
- If the grievance is found valid, corrective actions will be determined and implemented. These
 may include policy changes, disciplinary actions, or operational adjustments to prevent future
 occurrences.
- The stakeholder who raised the grievance will receive a formal response detailing the findings, resolution steps, and any corrective measures taken.
- If the grievance is not accepted, the stakeholder will receive a clear rationale for the decision along with any possible alternative avenues for resolution.
- Throughout the process, Ecochain Technologies B.V. ensures transparency and fairness in all communications and actions.



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Response to stakeholder grievances:

Ecochain Technologies B.V. commits to responding to all grievances by either:

- Regularly communicating each step and outcome of the resolution process, confirming when a resolution has been achieved, OR
- Providing a clear rationale for why the issue raised does not qualify as a grievance under this policy (see: 'Grounds for rejecting a grievance').

Protection against retaliation:

Ecochain Technologies B.V. strictly prohibits retaliation or discrimination against any external stakeholder who, in good faith, reports a concern or grievance under this policy. Retaliation includes, but is not limited to:

- Termination of contracts or business relationships
- Negative performance evaluations or references
- Harassment or intimidation
- Denial of services or opportunities
- Any other adverse action as a result of the whistleblower's report

Any stakeholder who believes they have been subjected to retaliation for reporting a concern or grievance should immediately contact the Confidential Officer. All such claims will be taken seriously and investigated promptly.

Ecochain's commitment to protection aligns with our Whistleblower Protection Policy, ensuring that individuals submitting grievances receive a high level of confidentiality and security. More information about 'protection against retaliation' can be found in this policy.

Contact information:

For any inquiries regarding this policy or to report a concern, please contact:

• Ethics officer: Lisa Overmars

• **Email address**: lovermars@ecochain.com

• **Phone number**: 06-27185675

Ecochain Technologies B.V. is dedicated to addressing grievances fairly and transparently. By maintaining open communication, clear processes, and strict protections against retaliation, we aim to foster an accountable and responsible business environment.