

Speak Up - Escalation policy

1 Assignment of a reported concern to a case manager

When a concern is reported through the webform or via telephone hotline, the issue is created into the Speak Up tool (case management application).

Initially, an issue gets the status 'unassigned'. This means that only admin users can see the content of this issue. At initial set-up, admin users are part of the Compliance Department of bpostgroup.

After a first analysis of the issue by an admin user, he /she will assign the issue manually to a specific case manager who will receive access to the issue and analyze it further.

The case manager will inform the direct superior (N+1) of a person who is the subject of a reported concern only if this information is strictly necessary to gather data indispensable to the proper investigation of the facts of the reported concern. In case of doubt about the need to inform the direct superior (N+1), the case manager is encouraged to seek advice from the Compliance Director of bpostgroup.

However, for the subjects of a reported concern listed in **column A** below, the admin users will inform the persons mentioned in **column B**.

[A] Subject of a reported concern	[B] Who will be informed?
President of the Board of Directors	President of the Audit and Risk Committee
President of the Audit and Risk Committee	President of the Board of Directors
Member of the Board of Directors	President of the Board of Directors, President of the Audit and Risk Committee
CEO bpostgroup	President of the Board of Directors, President of the Audit and Risk Committee
bpostgroup Exco member	CEO bpostgroup
CLO & Company Secretary bpostgroup	CEO bpostgroup, President of the Board of Directors, and President of the Audit & Risk Committee
Member of Senior Management	bpostgroup Exco member responsible for the senior manager
CEO/Head of a bpostgroup subsidiary	CEO bpostgroup, bpostgroup Exco member responsible for the subsidiary
Director Compliance	CLO and President of the Audit and Risk Committee
Director Audit	CEO bpostgroup and President of the Audit and Risk Committee
Local subsidiary case manager	CEO/Head of the subsidiary

Through admin users, the persons mentioned in column B will entrust a case manager with investigation assignments.

2 What if an admin user is the subject of a reported concern?

To avoid that an admin user would have access automatically to a reported concern in which his name is mentioned, escalation rules are built into the Speak Up tool. These escalation rules are implemented for each admin user and work as follows:

- If an admin user's name is mentioned in a reported concern, access will be automatically denied for all admin users.
- The name will be verified using all its possible spelling variations.

- Such a case will be automatically assigned to the Compliance Director of bpostgroup.
- If the name of the Compliance Director is mentioned in a reported concern, access will be automatically denied for all admin users.
- Such a case will be automatically assigned to the CLO and President of the Audit and Risk Committee.

3 What if a local subsidiary case manager is the subject of a reported concern?

If a local subsidiary case manager, to whom a case should normally be assigned under the Speak Up policy, is the subject of a reported concern, the issue will be assigned to CEO/Head of the subsidiary.

Through admin users, this person will entrust another local subsidiary case manager with investigation assignments.

4 What if the best positioned case manager for an issue is the subject of a reported concern?

Depending on the nature of a reported concern, admin users can assign the issue to the best positioned case manager for the type of issue at stake.

However, if such case manager is the subject of a reported concern, the issue will be assigned to his direct superior (N+1). Through admin users, this person will entrust another case manager with investigation assignments.

5 Confidentiality

The identity of a person who is the subject of a reported concern and the content of the reported concern are communicated to admin users, lead case managers and case managers for the exclusive purpose of the investigation triggered by the Speak Up process.

It is their responsibility to keep this information as confidential as possible.

Therefore, admin users, lead case managers and case managers may only use this information to the extent strictly necessary for the proper conduct of the investigation.

If the proper conduct of the investigation does not require the identity of the person who is the subject of a reported concern to be disclosed to a particular stakeholder during the investigation, this identity may not be disclosed.

In case of doubt as to whether and how to preserve the confidentiality referred to above, admin users and case managers are encouraged to seek advice from the Compliance Director of bpostgroup.