

Prologis Whistleblowing Privacy Statement (EU)

Last Updated: July 2025

Prologis is committed to fostering a culture of integrity, transparency, and accountability. To support this commitment, we provide a secure and confidential internal **Whistleblower System** that enables employees, contractors, and external stakeholders (collectively, “**Reporting Persons**”) to report unethical behavior, malpractices, illegal acts or omissions, or other wrongdoing within the organization of Prologis including reasonable suspicions about a breach or a potential breach (“**Report**”).

A breach or potential breach may be reported through the 24/7 **Ethics Helpline**, the secure online platform operated by **NAVEX**, or directly to an authorized Prologis contact point. Where permitted under applicable law, the Report may be submitted anonymously.

PERSONAL DATA WE COLLECT

In the context of the Whistleblower System, Prologis may collect and process the following categories of personal data:

- Identity, role, and contact details of the Reporting Person (unless reporting anonymously), of any individuals identified in the Report, and of those responsible for processing and investigating the Report;
- The facts and information reported, including any supporting documentation voluntarily provided;
- Records of the verification, investigation process, and any follow-up actions.

Depending on the nature of the Report, Prologis may also process special categories of personal data (e.g. health, political opinions, criminal allegations), in accordance with applicable legal requirements.

PURPOSE AND LEGAL BASIS OF PROCESSING

Personal data is processed solely for the purpose of receiving, verifying, investigating, and following up on a Report, as well as for compliance monitoring, documentation, and risk mitigation.

Processing is based on:

- Compliance with legal obligations, including the EU Whistleblower Protection Directive and relevant national laws;
- Prologis’ legitimate interest in maintaining an ethical and compliant working environment.

DATA ACCESS AND CONFIDENTIALITY

Access to personal data is strictly limited to authorized Prologis personnel who have a legitimate need to know, including members of the compliance, HR, and legal teams, as well as authorized third-party counsel and auditors. All processing activities are carried out in accordance with the principles of necessity and proportionality, and confidentiality is ensured throughout the process.

DATA RECIPIENT

We may share personal data, for the purposes outlined above, with:

- **Prologis affiliates**, where relevant, for internal compliance oversight and reporting coordination;
- **NAVEX**, our platform provider, acting as a processor under strict confidentiality obligations;
- **Authorized third-party counsel and auditors** assisting with the investigation or outcome implementation;
- **Third-party IT service providers** supporting the operation and security of the Whistleblower System;
- **Regulatory or judicial authorities**, where disclosure is required by law;
- **External legal counsel** for the establishment or defense of legal claims.

All recipients are bound by confidentiality and data protection obligations.

THIRD-PARTY PROCESSORS

Prologis uses trusted service providers such as **NAVEX** for secure hosting and management of the whistleblowing platform. These processors act under written instructions and are contractually bound by strict confidentiality and data protection obligations. See NAVEX's privacy statement: <https://www.navex.com/en-us/privacy-statement/>

INTERNATIONAL DATA TRANSFERS

As Prologis operates globally, personal data relating to a Report may be transferred to countries outside the European Economic Area (EEA) where Prologis entities or authorized service providers are located. In such cases, Prologis ensures that appropriate safeguards are in place, including the use of European Commission-approved Standard Contractual Clauses or other legally recognized mechanisms.

DATA RETENTION

Personal data is retained only as long as necessary for the purposes of the investigation and to comply with applicable legal obligations. Data not relevant to the processing purposes is promptly deleted or anonymized.

YOUR RIGHTS

Where Prologis processes your personal data in connection with the Whistleblowing System, you may, in accordance with applicable data protection laws, exercise the following rights: access, rectification, erasure, restriction, and objection to processing. These rights are subject to certain limitations, particularly where disclosure would affect the rights of others or investigations.

Requests may require identity verification. We will respond within the timeframe required by law and inform you if any legal exemptions apply.

You also have the right to lodge a complaint with your local data protection authority.

To exercise your rights, please contact: dataprivacy@prologis.com.