

# Speak Up Policy

## 1. Introduction

---

At Noventiq we have a culture of honesty and openness. If you witness or suspect any wrongdoing or unethical conduct at work, please report it. Your feedback could prevent wrongdoing which may damage Noventiq's reputation or performance and could even save people from harm.

Noventiq truly values the help of employees and third parties acting on behalf of Noventiq who identify and Speak Up about potential concerns that need to be addressed. Speaking up is encouraged. You will not suffer for raising concerns in good faith, and we will not tolerate any form of retaliation against you for speaking up.

Speak Up is the disclosure of information which relates to suspected wrongdoing, unethical conduct or dangers connected to work or the Noventiq business. The aim of this policy is to ensure that employees or any third parties acting on behalf of Noventiq can raise concerns about any suspected wrongdoing or unethical conduct without fear of reprisals.

## 2. Scope

---

This policy applies to all Noventiq employees operating at any level of the organisation and in any country across the world, as well as all third parties acting on behalf of Noventiq including suppliers, secondees, advisors, agency workers, contractors and other companies.

## 3. Sort of things that should be reported

---

You should report any potential breach of the Corporate Ethics and Compliance Code or any other Noventiq company policy or the law. There are many examples of potential activities which may relate to suspected wrongdoing or dangers connected to work and these may include:

- Fraud
- Bribery
- Human rights violations
- Discrimination or harassment
- Violations of competition laws and rules
- Money laundering or violations of sanction laws and export regulations
- Inadequate financial or non-financial recordkeeping
- Conflicts of interest
- Environmental, health and safety issues
- Improper use of company resources
- Insider trading
- Disclosure of confidential information

- Infringement of data protection regulations
- Violations of any of our (other) policies
- Retaliation against anyone for speaking up in good faith.

Do not use this policy:

- To report events presenting an immediate threat to life or property.
- If you need emergency assistance, please contact your local authorities or call your country's emergency phone number.
- For any grievances in relation to your terms of employment.
- To settle personal or legal disputes.
- To make accusations which you know are false. Doing so may lead to disciplinary measures.

If you're considering reporting a matter it is your responsibility to ensure that any report is made in good faith and you have reason to believe that the allegation is true. When reporting a concern, you're encouraged to provide as much information as possible, including names, dates, places, and details of the events that took place.

## 4. Raising a concern

---

### 4.1 Option 1: Tell your line manager

If you have concerns about wrongdoing or unethical behaviour you are encouraged to report them to your line manager in the first instance. If you are uncomfortable raising your concerns to your line manager you should use one of the alternative reporting methods below.

### 4.2 Option 2: Talk to the Global Chief Compliance Officer or Regional Compliance Business Partner

If your line manager is unable to address the problem or if you do not feel comfortable reporting the matter to your line manager you may contact Noventiq's Global Chief Compliance Officer or applicable Regional Compliance Business Partner who will deal with the matter in absolute confidence. Alternatively, you can email [Speakup@Noventiq.com](mailto:Speakup@Noventiq.com).

### 4.3 Option 3: Use the confidential "Speakup" service

There may be circumstances where employees feel unable or extremely uncomfortable reporting a concern internally. This confidential service allows you to report a concern by telephone (toll free), website or email. The telephone and web service are operated by an external and independent organisation which is available 24/7 and 365 days a year.

- Report Online: [www.Noventiq.com/speakup](http://www.Noventiq.com/speakup)
- Report by Telephone: a complete list of numbers is available online

- Report by Email: [speakup@Noventiq.com](mailto:speakup@Noventiq.com)

## 5. Employee confidentiality and Anonymity

---

If you report any wrongdoing or unethical behaviour the matter will be treated confidentially and your details will not be disclosed unless there is a legal obligation to do so. Noventiq is under a legal obligation to protect your interests and position and we will ensure anyone who raises an honest concern in good faith is supported and protected. You may report a matter anonymously but we would encourage you to go on the record. If we don't know who you are when a matter is reported we cannot guarantee your subsequent protection of confidentiality in dealing with it.

## 6. What should you do if you notice any retaliation?

---

If you notice any retaliation against you or against anyone else for raising or having raised a concern in good faith about suspected wrongdoing or unethical behaviour, report this via one of our Speak Up 3 channels. A report on retaliation against a reporter is treated like any other Speak Up report and the same procedure is followed.

## 7. What happens next?

---

Noventiq takes every report of possible wrongdoing or unethical behaviour seriously. If you submit a report, you will receive a confirmation of receipt within 5 to 7 working days, with an estimate of how long it will take to handle and assess your concern. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. Investigation may involve other people in the business and teams such as Security, HR and Legal but your details will not be given to those investigating the matter unless absolutely necessary. On average, closure of the matter can be expected within 1 to 3 months. You will be informed of the overall findings, i.e. whether or not we have established that wrongdoing or unethical behaviour has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

## 8. Managing reporting concerns

---

If you're a line manager who receives a report of wrongdoing or unethical behaviour you should maintain absolute confidentiality between yourself and the person making the report. Do not contact the subject of the report or try to solve the matter by yourself. Document all of the facts available: person(s) involved, details of concern, evidence, dates, etc. You should then act immediately to contact the Global Chief Compliance Officer or applicable Regional Compliance Business Partner to discuss the

matter further.

## 9. What is expected of you in connection with investigations?

---

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Lying to the people performing the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

## 10. Appropriate measures

---

If your concern is well-founded (i.e. wrongdoing has indeed taken place), appropriate measures will be taken where necessary in accordance with applicable policies and the law.

## 11. How can a supplier report a concern?

---

Noventiq needs supplier participation in speaking up should a supplier encounter or suspect improper conduct from any Noventiq employees, no matter how senior, in any area of Noventiq's business. All matters reported will be treated with absolute confidence and the supplier's details will not be disclosed unless there is a legal obligation to do so or a matter may be reported anonymously. The supplier will be told the outcome of any investigation into the concern on a confidential basis unless there is a legal reason why Noventiq can't share this. If the supplier is not satisfied by this approach Noventiq would urge the supplier to contact Noventiq's Global Chief Compliance Officer or Chief Executive directly.

## 12. How can a supplier report a concern?

---

- Corporate Ethics and Compliance Code
- Anti-Bribery and Corruption Policy
- Grievance Policy
- Supplier Code of Conduct

## 13. Revision History

---

Issue No	Version No	Issue Date	Summary of Changes
1	1.0	June 2021	Initial Document

2	2.0	June 2021	Revision of Initial Document
3	3.0	November 2021	Final Document

**S.V. Chernovolenko, Global CEO of Noventiq**

