

NETCEED SPEAK UP POLICY

I. INTRODUCTION

Purpose

The purpose of this Speak Up Policy (“the Policy”) is to explain what NETCEED (“NETCEED” or the “Group”) Group Personnel (defined below) must do if they encounter or suspect any misconduct or suspicion of misconduct in violation of applicable laws or regulations, the Code of Conduct, or our policies and procedures.

The Group is committed to conducting daily business with honesty, transparency, integrity and to comply with internal and external regulations and laws.

This Policy is designed to promote openness, accountability, and a culture of integrity and fairness. It offers guidance on:

- The **responsibility** everyone has to speak up about actual or potential misconduct;
- The **reporting channels** available to speak up; and
- NETCEED’s **policy against retaliation** and its **commitment to protect** those who report misconduct in good faith and a timely manner, and to handle their reports confidentially.

This Policy should be read in conjunction with the Code of Conduct and other Group policies and procedures.

Scope

The Policy applies to all directors, officers, employees, agents, representatives, and other associated persons of NETCEED (collectively “Group Personnel”) who wish to raise a concern involving a person who carries out work for the Group.

II. WHEN TO SPEAK UP

What Should be Reported?

Group Personnel have a responsibility to promptly report, in good faith, any actual, or potential breach of the Code of Conduct, or any other NETCEED policies and procedures, or violation of law. This responsibility for reporting misconduct or suspected misconduct applies to all Group Personnel, regardless of their seniority in the Group.

Group Personnel must speak up if:

1. You believe that someone acting on behalf of NETCEED is doing, has done, or might be doing something that violates applicable laws and regulations, the Code of Conduct, or our policies and procedures.
2. You are unsure about the proper course of action and are in need of advice.

3. You believe that you may have been involved in misconduct; and
4. You believe that someone who followed the Policy in good faith has been subject to retaliation.

The Policy is not intended to be used to settle individual complaints or grievances which do not rise to the level of misconduct or violations of policy.

Examples of Types of Misconduct

Examples of types of misconduct and suspected misconduct that should be reported:

- Discrimination and harassment;
- Fraud;
- Violations of applicable laws or regulations, the Code of Conduct, or other NETCEED policies and procedures;
- Careless handling of confidential information;
- Data breaches;
- Improper use of NETCEED resources;
- Unfair competition;
- Conflicts of interest;
- Breach of sanctions;
- Violations of human rights;
- Modern slavery;
- Money laundering;
- Tax evasion; and
- Any form of bribery or corruption.

III. HOW TO SPEAK UP

Speak Up Internally

All NETCEED Personnel are responsible for reporting any actual or potential misconduct or suspected misconduct. If you encounter any misconduct or suspect any misconduct, please speak up through one of the channels below:

- **Your supervisor** usually is the right person to bring up a compliance or integrity issue.

However, if you have reason to believe that your supervisor may be complicit in the violation, you should instead report the issue to:

- **Your functional manager, Human Resources Director, Chief Legal Counsel, or another member of the Executive Committee.**

It is important to identify and escalate concerns as early as possible. By doing so, NETCEED has the opportunity to look into the matter and to determine appropriate action to be taken. NETCEED therefore encourages you to report concerns in whatever form and whatever method is most comfortable to you.

What Kind of Information Do I Need to Provide?

While Group Personnel should not conduct their own investigations, Group Personnel should provide as much information as possible when making a report. Please include the following information in your reports:

- The background, history, and reason for concern;
- Dates, places, people's names;
- Examples of the behavior in question;
- Any documents relevant to the situation; and
- Whether you've already discussed the situation with someone, and if so, with whom and when.

The more specific detail you are able to provide, the better NETCEED will be able to respond to your concern. However, even if you are not aware of all of the facts you should not be discouraged from speaking up.

Speak Up Externally

Group Personnel are encouraged to speak up internally first. The Group accepts that there are some situations in which you are not able to speak up internally. In that case you should speak up externally, in line with all applicable laws and regulations.

Examples of these situations include:

- When you are in acute danger;
- When it is your legal duty;
- When you are in a reasonable fear of serious retaliation as a result of internal reporting;
- When you have a reasonable fear that evidence will be destroyed; and
- When an earlier, internal report has not been handled appropriately in a reasonable timeframe.

IV. WHAT HAPPENS AFTER YOU SPEAK UP?

Reporting and Process

Every report of a potential compliance issue will be taken seriously. These are the next steps you can expect after you speak up:

- You will receive confirmation of receipt of the report as soon as possible .

- Your report will undergo an initial review in order to determine whether further investigation is required.
- If further investigation is considered appropriate, you may be approached to provide additional information. All investigations will be conducted objectively, in full confidentiality and in accordance with all applicable laws and policies. At this stage, external experts such as lawyers or accountants can be engaged to assist with an investigation.
- The party responsible for conducting the investigation will report the outcome to the NETCEED Board of Directors. This will be done as soon as possible.
- NETCEED will take such prompt and appropriate corrective action, if any, as it deems appropriate, upon completion of the investigation into the reported misconduct.

Conduct of an Investigation

Investigations will be conducted by the relevant Human Resources Director, where appropriate, in collaboration, as the case may be, with the Chief Legal Counsel, and the Chief Executive Officer. NETCEED may engage external advisors such as law firms and accountants, in each case subject to terms of confidentiality, to assist with any investigation.

If you become involved in an investigation, you must cooperate and answer all questions completely and honestly. 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 strictly confidential.

Receiving Reports as a Manager

If you are a supervisor, manager, or a senior leader who receives a report of misconduct, your first responsibility is to listen to the reporter; from there you are required to satisfy your responsibility under this policy by reporting it to the appropriate persons including Human Resources Director, Chief Legal Counsel, or another member of the Executive Committee. The expectation is that you will not investigate the report on your own.

V. PROTECTION AND CONFIDENTIALITY

Confidentiality

All reporting of misconduct or suspected misconduct is confidential and will be carefully studied. This means your report and other information regarding the investigation will only be shared with a limited number of people, all of whom will be under an obligation to keep such matters confidential. The confidentiality obligation extends over: communications that a report has been made or that an investigation is underway or being considered; information identifying the person(s) involved; the subject matter; the process followed; the materials or information gathered; and the results of the investigation.

The Group guarantees that the identity of any person reported, and all reports will be treated confidentially.

The Group is committed to protect the privacy of Group Personnel. We will do everything reasonable to safeguard personal data from unauthorized access and processing. You can send an email to privacy@netceed.com in order to gain access to your personal data and, as the case may be, to request that this data be rectified, completed, updated, blocked, or deleted.

Non-Retaliation

Group Personnel who, in good faith, seek advice, raise concerns relating to (real or suspected) misconduct in accordance with the Policy are doing the right thing. NETCEED will not tolerate retaliation against anyone who makes a report or anyone cooperating with an investigation. Any retaliation will, itself, be misconduct and could result in disciplinary action, up to and including dismissal.

Retaliation can take many forms and may include:

- Negative employment action, such as demotion, termination, salary reduction, or an unjustified job or shift reassignment.
- Efforts to silence or punish a reporter through economic incentives or other benefits;
- Actions that undermine the reporter's psychological safety—such as intimidation, actual or implied threats, bullying, harassment, or discrimination; and
- Exclusionary behaviors, such as shunning and/or avoiding a reporter, excluding them from meetings or email chains, giving someone the “cold shoulder,” gossiping about the individual, interfering with the individual's relationships with other NETCEED Personnel, or creating—or allowing others to create—a work atmosphere that is hostile towards the individual.

Retaliation should also be reported as soon as possible through one of the Speak Up channels listed in Part III (“How to Speak Up”) above.

Vexatious Reports

Malicious or vexatious reports, or reports which contain knowingly false allegations, or which were made for personal financial gain, may result in disciplinary action, up to and including termination of employment. This statement should not be read to discourage reporting honestly held concerns in good faith, even if such concerns are determined to be unfounded.

VI. MORE INFORMATION

If you have any questions regarding this Speak Up Policy or need further assistance, please contact the Human Resources Director, Chief Legal Counsel, or another member of the Executive Committee. For more information about this policy, please contact a country HR.

This policy will be reviewed annually and NETCEED is committed to continuous improvement.

Approved by Board of Directors
Date 11/07/2024

About the policy

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