

ZERO TOLERANCE TO RETALIATION



Our Company truly values anyone who speaks up when they see something wrong involving our Company or people. We strictly prohibit any form of retaliation.

As a Company, we expect everyone to act responsibly and with integrity, with respect for people and the law. We actively encourage people to share any concerns and speak up when they sense something isn't right, so we can address it. Speaking up is an important part of building an open, trusting culture – a cornerstone in upholding our commitment to integrity. It helps to protect our Company and people and foster a healthy workplace. As we highly value individuals who speak up, no one should ever face retaliation when doing so.

As stated in our Code of Business Conduct (the Code), we strictly prohibit any form of retaliation against anyone who speaks up in good faith or cooperates in an investigation. Retaliation is a violation of the Code and will lead to disciplinary action. This document gives more explanation and guidance about our non-retaliation policy.

WHAT IS RETALIATION?

Unfortunately, retaliation can come in many different forms, some subtle and some more direct. While it's impossible to provide a comprehensive list, here are some examples illustrating what retaliation could entail:

- Aggressive and threatening behaviour
- Bullying, belittling or shaming someone in front of others
- Intentionally ignoring or excluding someone
- Making inappropriate or derogatory remarks about someone, their family or friends
- Suspension, demotion or termination
- Unfairly paying or compensating someone, including denial or prevention of raise, bonus, promotion or benefits (when otherwise deserved)
- Unfair performance evaluation / Performance downgrades
- Changing the nature and scope of the work to be performed by the employee as a form of punishment. This may include:
 - Removal from key accounts or projects, removal of decision-making power
 - Reduction of hours
- Setting up for failure through overly burdensome or unrealistic expectations or deadlines
- Filing a Speak Up report against the person in bad faith

While the previous examples highlighted retaliatory actions against employees, retaliation can extend to others who speak up, including business partners. An example of retaliation is termination of the relationship with a business partner as a punitive measure for them speaking up about misconduct involving our Company or employees.

WHO IS PROTECTED AGAINST RETALIATION?

In short: anyone (whether employed by our Company or not) who:

- asks questions or voices concerns about potential violations of our Code
- seeks guidance on whether or not to speak up about potential violations of our Code
- speaks up (whether through a formal report or not) about potential violations of our Code
- helps, supports or encourages another person to speak up (unless in bad faith)
- cooperates in an investigation (or any other proceedings) into potential violations of our Code, for example by being interviewed or providing information and documents
- is involved in taking actions in case of confirmed Code violations, for example implementing disciplinary measures.

When we refer to violations of our Code, this includes suspected and potential Code violations.

WHAT ARE THE CONSEQUENCES OF ENGAGING IN RETALIATION?

Any **attempted or actual retaliatory action** by any employee is considered a violation of the Code that can lead to disciplinary action. This means that the employee or employees involved in such activities are subject to sanctions as outlined in the [Disciplinary measures Policy](#). Depending on the severity, this may include dismissal.

ARE THERE ANY EXCEPTIONS TO THE NON-RETALIATION POLICY?

We start from the principle that when someone speaks up about potential Code violations, they're doing so in good faith. In other words, that they genuinely and honestly believe something isn't right, and provide truthful information.

However, if it turns out that someone hasn't acted in good faith and wasn't sincere when raising the concern – for instance, by deliberately providing false information and/or making wrongful accusations – that's considered a violation of the Code, and appropriate action will be taken.

It's important to understand that even if someone hasn't acted in good faith, it's never okay for anyone else to try to get back at them and retaliate. Instead, our Company will look into the matter through a formal and confidential investigation and apply appropriate sanctions in accordance with our [Disciplinary measures Policy](#) where needed.

Thus, there are never any circumstances where retaliation is appropriate, acceptable or tolerated.

WHAT SHOULD YOU DO IF YOU SUFFER, WITNESS OR SUSPECT RETALIATION?

If you suspect or experience any form of retaliation, you should speak up to ensure our Company can investigate it take adequate action to end or prevent any retaliation.

If you become aware that retaliation is occurring against someone else, then you are also requested to speak up. By alerting our Company, you give us the opportunity to address the issue and offer protection to those who need it.

There are various channels available to speak up (refer to the Speak Up section of our Code), including a dedicated [Speak Up portal](#). You can choose whichever channel you find most comfortable.