

Speak Up Policy

Scope

This Speak Up Policy ('Policy') applies to all employees, contractors, volunteers, interns and agency workers of Yondr. This Policy also applies to anyone acting on behalf of or working for Yondr such as consultants, subcontractors and agents or any other third party who has a suspicion of misconduct in relation to Yondr ("external person").

Purpose

All of us at one time or another have a concern about what is happening at work as it may involve something that could impact the organization or affect others. The purpose of this Policy is to encourage you to speak up and provide a mechanism for colleagues or third parties to raise genuine concerns on any activities carried out by or in relation to Yondr, whilst ensuring protection from victimisation, harassment or disciplinary proceedings for those who do so.

Some of these concerns can include risks, wrongdoing or malpractices in the following areas:

- Undesirable behaviour such as bullying, discrimination, sexual harassment, intimidation, aggression and abuse.
- Bribery and corruption
- Modern slavery
- Financial fraud, mismanagement or negligence
- Danger to health and safety
- Danger to the environment
- Failure to comply with legal obligations
- Disclosure of confidential information
- Damage of Yondr's reputation
- Breach of internal company policies/procedures

This Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, employees or the company itself. This Policy does not cover concerns or complaints related to your own personal employment position or how you have been treated at work. If you want to file a complaint about your employment please contact your manager or People Partner.

Our Assurances to You

Your safety

The Board of Directors at Yondr are committed to this Policy and reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have at an early stage and in the right way. You are not required to provide any proof or firm evidence before raising the

concern but an honest and reasonable suspicion that a wrongdoing or malpractice has been or is likely to be committed is sufficient.

Provided you are raising a genuine concern, it does not matter if you are mistaken; you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

Your confidentiality

We recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If you ask us not to disclose any information provided under this procedure, we will not do so without your consent, including your identity. Depending on the nature of the matter you have raised, we may be required by law to disclose some or all of the information to a third party. You will be informed if such disclosures are made.

You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

Yondr shall ensure that the reporting is handled in a confidential manner and shall not be disclosed to anyone other than authorised Yondr employees.

Deliberate false reporting

Deliberately making a false allegation to discredit an employee, Yondr or any other person or entity for any reason, constitutes gross misconduct and if, as part of an investigation to the concerns you have raised, it becomes clear that you have NOT used this Policy in good faith, this will trigger disciplinary actions and/or legal action.

How to Raise a Concern

If something is troubling you which you think we should know about or investigate, you are encouraged to speak up. By doing so, you give Yondr the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen the situation and undermine trust. Please follow one of the following options in order to raise a concern:

Option one

If you have a concern, we hope you will feel able to raise it first with your manager or People Partner. This may be done verbally or in writing.

Option two

If for any reason you feel unable to raise the matter with your manager or People Partner, or if you are an external person, please raise the matter with the:

Compliance Department
compliance@yondrgroup.com

If one wants to report anonymously this can be done via Safecall as described under option 3 below.

Option three

If options one and two above have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, or you are worried about remaining anonymous by reporting the matter internally, please contact:

Safecall - see appendix 1 for country specific contact details.

Safecall is an independent external facilitated reporting line where you may raise your concerns. All calls are treated with the utmost confidentiality by staff who are independent to Yondr and who will, should you wish for whatever reason, not disclose your identity to Yondr employees or make the report completely on an anonymous basis (if permitted under your local law) or make the report completely on an anonymous basis (if permitted under your local law).

Once the details of the concerns you are raising have been received by Safecall staff, they will summarise the content and send it to Yondr's Compliance department for consideration and further investigation. If you have requested to remain anonymous, further information may be sought from you, via Safecall.

You can contact Safecall 24 hours a day, seven days a week, on a freephone number (see appendix 1 for a list of freephone numbers to call depending on which country you are calling from).

Alternatively, Safecall can be contacted via e-mail, or via their website.

Review and investigation

- Yondr shall start an internal investigation based on the assessment of the information obtained and when this leads to sufficient grounds that the concern raised is a matter that falls under this Policy.
- The individual who raised the concern shall be informed whether the concern raised will be further investigated, but due to confidentiality reasons shall not be informed on the results during the investigations. The individual shall be updated on the progress of the investigations and may be asked for further information (in case the concern is not raised on an anonymous basis).
- If needed, outside experts (e.g. lawyers or accountants) will be engaged to assist in the investigation. They shall work under strict confidentiality. Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing). Details of the case (including individuals involved), are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.
- If the investigation leads to the conclusion that misconduct has taken place, Yondr shall decide upon suitable measures.

- The individual who raised the concern shall be informed that the investigation has been completed and whether measures have been taken.

Appendix 1

Country	Telephone number
Belgium	00 800 7233 2255
Finland	999 800 7233 2255 / 990 800 7233 2255
Ireland	1800 812 740
Netherlands	00 800 7233 2255
Singapore	800 448 1773
UK	0800 915 1571
India	000 800 4401 256
Indonesia	001 803 440 884
USA	1 866 901 3295
Mexico	01 800 123 1758

For the complete list of countries telephone numbers, please see

<https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>

Alternatively, a report can be filed at www.safecall.co.uk/report