

SPEAK UP POLICY

Policy Owner:	Governance, Risk and Compliance Director
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01. Purpose

All of us, at one time or another, might have a concern about what is happening at work. The purpose of this Policy is to encourage you to speak up. It provides a mechanism for Yondrites and third parties to raise genuine concerns on any (potential) wrongdoing in the workplace.

We will ensure that you will be protected from any negative consequences for speaking up and do not tolerate any form of retaliation for doing so. By speaking up, you give Yondr the opportunity to deal with the issue and prevent or reduce its impact.

02. Scope

02.1 Applicability

This Policy applies to:

- / full-time, fixed term, part-time, PEO, and temporary employees,
- / officers and directors,
- / interns and secondees, and
- / agency workers, casual workers, volunteers, contractors, and consultants, as relevant to the nature of their engagement, and

Classification: Internal

- / who provide work and/or are engaged to deliver goods and services on behalf of Yondr (referred to at times as 'we,' 'us,' 'our,' and 'ours,' and includes affiliates, subsidiaries, or entities in which Yondr holds a significant interest), regardless of where in the world they are situated.

This Policy should not be construed or implied to infringe on rights guaranteed by the laws of the local jurisdiction, thus, where this Policy conflicts with local rules, laws or regulations, the local framework shall prevail.

03. Policy requirements

03.1 Yondr's assurance to you

Your safety

Yondr is committed to your safety and wellbeing when raising any concern under the scope of this Policy. You are not required to provide any proof or firm evidence before raising a concern.

It is sufficient that you have an honest and reasonable suspicion that a wrongdoing or misconduct has been or is likely to be committed.

Provided you are raising a genuine concern, it does not matter if you are mistaken; you will not be subjected to negative consequences, such as suffering from any form of reprisal as a result. Yondr will not tolerate the harassment or victimisation of anyone raising a genuine concern and will consider it a disciplinary matter to victimise anyone who has raised a genuine concern. The same applies to the individuals investigating the concern as well as anyone supporting the individual who has raised the concern.

Your confidentiality

Any information you disclose under this Policy will only be shared on a strict "need-to-know" basis, but your identity and anonymity will be maintained.

Yondr recognises that there may be circumstances when you would prefer to speak to someone confidentially first, which is available via Safecall. When you raise a concern with Yondr directly, you may ask Yondr to not disclose any information provided under this procedure, and Yondr will use its best endeavours to avoid disclosure of any information without your prior consent, including your identity.

You should understand that there may be times when we are unable to resolve a concern without revealing details of your concern, including potentially your identity, for example, when your personal evidence is essential. In such cases, we will discuss with you whether and how



the matter can best proceed. Additionally, depending on the nature of the matter you have raised, Yondr may be required by law to disclose some or all information to a third party. You will be informed if such disclosures are made.

03.2 Yondr's expectations from you

Take action

If you suspect any potential misconduct in relation to Yondr, we need you to act and speak up. Remaining silent about possible misconduct may worsen the situation and undermine trust.

In accordance with this Policy, there are several options available reporting a concern (refer to Section 3.3 below). You are encouraged, but not required, to speak to your Line Manager in the first instance.

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

- / Bribery and corruption.
- / 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 to Yondr's reputation.
- / Breach of internal company policies/procedures.

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 or report a situation of undesirable behaviour such as bullying, discrimination, intimidation, abuse or any other misconduct, please reach out to a confidential mailbox- - grievances@yondrgroup.com. We will follow the procedure as set out in the relevant local Employee Handbook or any other local procedures in place dealing with grievances and Yondr-ite's complaints more generally.

Raise your concern in good faith

We expect that all concerns raised under this Policy are made in good faith. Deliberately making a false allegation to discredit a Yondr-ite, Yondr or any other person or entity for any reason may constitute serious or gross misconduct. If, as part of the investigation to the concerns you have raised, it becomes clear that you have not used this Policy in good faith, this may trigger a process under the disciplinary policy that applies in the country where you

work, and may lead to disciplinary sanctions up to and including dismissal (with or without notice or payment in lieu of notice) and/or legal prosecution disciplinary and/or legal action (refer to Appendix B for the [Equal Opportunities and Anti-Discrimination Policy](#) and [Anti-Harassment and Bullying Policy](#)).

03.3 Raising a concern

There are different options available for reporting concerns, including:

Option 1: reporting to your Line Manager

We want you to feel comfortable to raise your concern with your Line Manager. We therefore encourage you to discuss your concern first with your Line Manager.

Option 2: reporting to the GRC Team

If for any reason you feel unable to raise the matter with your Line Manager, consider reporting the matter to the GRC Team.

If you are external to Yondr, you can reach out to your Yondr Account/Relationship Manager who will raise it with the GRC Team.

You can contact the GRC Team via compliance@yondrgroup.com or directly reach out to the GRC Director or the Compliance Manager.

If you want to report the matter confidentially to the GRC Team, you must make it clear in the communication so that appropriate arrangements can be made.

If you don't feel comfortable raising your concern within Yondr or you want to report it anonymously, you can do this using option 3 outlined below.

Option 3: reporting anonymously (Safecall)

If you have followed option one and/or two and still have concerns, or if you do not feel comfortable discussing the matter internally, or want to remain anonymous, please contact our external reporting platform, Safecall.

Safecall

Safecall is an independent external facilitated reporting platform 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-ites or make the report completely on an anonymous basis (if permitted under your local law).



When you report a concern via Safecall, the content of the details will be summarised and sent to the GRC Team for consideration and further investigation. If you have requested to remain anonymous, further information may be sought from you later, via Safecall.

Safecall is available 24x7x365 on a freephone number (refer to Appendix B). Concerns can also be reported via their website [here](#).

04. Review and investigation

Yondr shall start an internal investigation based on the assessment of the information obtained. This will be carried out by the GRC Team, as follows:

The GRC Team will make an initial assessment. If the concern raised is a matter that falls under this Policy, the procedure will be as follows:

- / The individual who raised the concern will receive a confirmation of receipt within 7 days after the concern has been raised.
- / The individual who raised the concern shall be informed whether the concern raised will be further investigated. 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). This will be within a reasonable term, and if possible, within 3 months after receipt of the concern raised. Due to confidentiality reasons, the individual who raised the concern shall not be informed on the results during the investigations.
- / The review and investigation are conducted independently, fairly and are unbiased with respect to all parties involved and in accordance with relevant laws and principles (including a fair hearing). Details of the case (including individuals involved) are kept confidential throughout and after the investigation and will only be shared on a need-to-know basis.
- / If needed, external experts (e.g. lawyers, investigators or accountants) will be engaged to assist in the investigation. They shall work under strict confidentiality.
- / 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 once the investigation has been completed and if applicable and suitable depending on the specific circumstances of the misconduct, whether measures have been taken.

05. Roles and responsibilities

05.1 All covered by this policy

- / Abiding by the requirements noted in this Policy.
- / Promptly disclosing any potential policy breaches they become aware of.
- / Communicating Yondr's policies to third parties where required.

05.2 Line Managers

- / Ensure team members understand this Policy and abide by it.
- / Provide guidance as necessary.
- / Be available for any concerns raised under this Policy.

05.3 People Team

- / Provide guidance as necessary.
- / Investigate concerns raised under this Policy following request GRC Team.

05.4 GRC Team

- / Provide guidance as necessary.
- / Review and investigate concerns raised under this Policy in accordance with Section 3.4 of the Policy.



Appendix A: Key Terms

Anonymous

Describes a state where an individual's identity is unknown or not revealed.

Confidential

Information that is intended to be kept private and not disclosed to unauthorized individuals.

Safecall

A whistleblowing hotline supplier that provides Yondr-ites a platform to report ethical concerns or potential misconduct anonymously and confidentially.

Appendix B: Associated documentation

Document name

[Equal Opportunities and Anti-Discrimination Policy](#)

[Anti-Harassment and Bullying Policy](#)

Appendix C: Associated documentation

Country	Telephone number
Canada	1 877 599 8073
Finland	999 800 7233 2255 (Elisa)
Germany	00 800 7233 2255
Indonesia	001 803 440 884
Ireland	1 800 812 740
Malaysia	1800 220 054
Netherlands	00 800 7233 2255
Portugal	00 800 7233 2255
Singapore	800 448 1773
UK	0800 915 1571
USA	1 866 901 3295

A complete list of country telephone numbers is available at <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>

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