

Whistleblower Policy

Policy Approver	Policy Owner	Effective Date
Group Chief People Officer	Reward & Policy	28 June 2023
Alison Perren	Tabatha Leach	Version 1.0

1. Purpose & Scope

Boldyn Networks is committed to the highest possible standards of ethical, moral, and legal business conduct. The Company is committed to open communication and enabling a safe environment in which employees can raise concerns, in the first instance with their line manager, a colleague or a member of the People Team. In conjunction with these commitments, this policy aims to provide an avenue for employees to raise serious concerns with the reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

The whistleblowing policy is intended to cover the reporting of serious concerns that could have an impact on the company, such as actions that:

- Are dishonest, fraudulent, or corrupt.
- Are unethical or unlawful.
- May lead to incorrect financial reporting.
- Are not in line with company policy, including our Code of Conduct Policy; or
- Otherwise amounts to serious improper conduct.

A whistleblower is defined as any individual who discloses a concern or complaint to a matter covered in this policy. Any individual who makes a report under this policy will be provided protection from retaliation by the company where they have had reasonable grounds to suspect improper conduct. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments, discrimination, harassment and threats or actual physical harm. Any whistleblower who believes they are being retaliated against must contact their People Leader immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

2. Eligibility

This policy applies to employees of Boldyn Networks and its subsidiaries (the "Company").

This policy is extended to allow any person or body outside of the Company to make use of the reporting mechanisms described in clause 4. Procedure.

3. Entitlement

The policy allows employees to remain anonymous at their discretion. If an employee feels that their anonymity is not required and it is related to a personal concern in respect of their own treatment then they should follow existing local grievance procedures.

Concerns expressed anonymously will be investigated, and consideration will be given to:



- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

If an employee’s grievance is a personal concern about the way they have been treated then they should follow existing local grievance procedures.

4. Procedure

4.1 Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns include those related to financial reporting, unethical or illegal conduct, breach of the company code of conduct or other improper conduct. Concerns covered by this policy should be reported to our hotline provider in any of the following ways: Website reporting; Telephone reporting; Via the App; Via Email; Via Fax, In person. The following tables outline the different access routes to reporting and are available 24 hours a day, 7 days a week, 365 days a year. In the event an employee wants to seek additional information or advice before formally making their disclosure, they can reach out to their local People Team to discuss options for reporting within their region or across regions.

4.1.1 - Website Reporting

Main Website	Language selections available
https://www.lighthouse-services.com/boldyn	English, Italian, Traditional Chinese, Simplified Chinese, Spanish

4.1.2 Telephone Reporting

Reporter’s Country	Telephone Numbers	
North America	Toll-Free telephone, Direct Dial: USA and Canada: 833-208-5380 (English) USA and Canada: 800-216-1288 (Spanish) Canada: 855-725-0002 (French)	
All other countries	First dial the Country Access Code (listed below for most of our office locations). This will connect the caller to AT&T international toll-free calling and the caller should follow the telephone prompts. When asked for the number you require dial 800-603-2869 AT&T Direct Toll-Free Access Codes Global Access Codes (att.com)	
	AT&T Access Code	Number you require
United Kingdom	0-800-89-0011	800-603-2869
Ireland	1-800-550-000	800-603-2869
Italy	800-172-444	800-603-2869
Hong Kong	800-93-2266	800-603-2869
Australia	1-800-551-155 (Optus) or 1-800-881-011 (Telstra)	800-603-2869



Detailed instructions when calling from Outside North America

1. Make sure you have an outside line
2. Enter the AT&T Access Code for the country and/or the telephone system you are calling from. You will then hear a 'bong'.
3. An English-language voice prompt will ask for the number you are calling.
4. Enter our toll-free number: **800-603-2869**. There is no need to dial "1" before the toll-free number.
5. You are now connected to the hotline.
6. A Lighthouse greeting will be played in multiple languages. Make a choice from the pre-recorded language prompts or press 000 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2-3 minutes. The Lighthouse operator will interview you, aided by the interpreter.
7. A report in English is then sent to the designated recipient(s) of your company.
8. Access codes are subject to change

4.1.3 Anonymous Reporting App

The **Anonymous Reporting** App from Lighthouse Services can be downloaded to your phone and will enable you to submit new anonymous reports and follow up on any previous anonymous reports related to an issue at the company

For iPhones	Anonymous Reporting on the App Store (apple.com) https://apps.apple.com/us/app/anonymous-reporting/id1503463541 Apple App Store (https://www.apple.com/ios/app-store)
For Non iPhones	Anonymous Reporting - Apps on Google Play https://play.google.com/store/apps/details?id=com.Syntrio.LightHouse&pli=1 Google Play store (https://play.google.com/store)

Making a Report

1. When you open the app, it will present you with a field containing the words "Enter Keyword".
2. The keyword is **boldyn**.
3. Once you enter it, click "Save". This will save that keyword in "Your Keywords".
4. Click the keyword to submit your report.

After submitting a report, you will be provided with a case number. You can store this case number in the app by copying the case number provided, clicking on the edit icon for the keyword and pasting it into the 'Enter Case Number' field. If you provided a PIN during report submission, check the 'This case number has a PIN' checkbox. There is no field to save your PIN; you will still need to remember it. Select 'Save' to store the case number.



4.1.4 Other Reporting Methods

Other Reporting Methods
E-mail: reports@lighthouse-services.com (must include Boldyn Networks with the report)
Fax alternative for written documents: 215 689-3885 (must include Boldyn Networks with report)
In person reporting: A report may be made verbally or in writing directly to an officer or senior manager of the company including the Group General Counsel or the Chief Risk Officer. Employees in these roles are considered Eligible Recipients. With the reporter's consent any eligible recipient of such a report will ensure that it is logged into the external reporting system Lighthouse, anonymously or otherwise, to enable the appropriate tracking and investigation process to be undertaken.

4.2 Anonymity

Reporters to the hotline will be entitled to request their identity remains anonymous. Reports received by Lighthouse are submitted to Boldyn Networks for investigation. The information provided by the reporter may lead to an internal and/or external investigation. Where a reporter wishes to remain anonymous, and whether an investigation is undertaken internally or externally, the Company will do all it can to ensure a reporter's anonymity is protected, to the extent possible by law. However, a reporter's identity may become known during an investigation due to the nature of the information provided.

The law recognises in some circumstances it may be appropriate for a reporter to report concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

Employment-related concerns from employees should continue to be reported through the normal channels such as their line manager or People Team.

4.3 Following a report or disclosure of improper conduct

The Company is committed to ensuring the following principles are followed:

4.3.1 Ensuring fair treatment of individuals mentioned in a disclosure

The Company will ensure at all times that any individual who is a reporter, the subject of a disclosure or involved in an investigation will be treated fairly. The Company will, where practicable, implement the following measures to ensure fair treatment of these individuals:

- a) Disclosures will be handled confidentially;
- b) Each disclosure will be assessed and may be the subject of an investigation;
- c) The objective of an investigation of a disclosure is to determine whether there is enough evidence to substantiate the matters reported;
- d) When an investigation needs to be undertaken, the process will be objective, fair and conducted in an independent manner;
- e) An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required, and the principles of natural justice and procedural fairness followed prior to any actions being taken; and
- f) All employees involved in a disclosure will be advised to access to Boldyn Networks Group's Employee Assistance Program to access support.



4.3.2 Handling and Investigating a disclosure

An Eligible Recipient will assess all disclosures to determine whether:

- a) it qualifies as a protected disclosure under this policy; and
- b) a formal, in-depth investigation is appropriate.

Investigations of disclosures made under this Policy shall be undertaken in accordance with standard investigative methods for workplace investigations.

The Company may, through the Lighthouse Hotline, request that the reporter consent to a limited disclosure of the reporter's identity being made to the assigned investigator for the purpose of gaining additional information to investigate the matter.

When a disclosure is received, it will be assessed to determine if it qualifies for protection and whether a formal investigation is required. In some instances, a broad review of the subject matter may be warranted instead of a formal investigation.

The investigator will be independent of the reporter, the individuals who are the subject of the disclosure and the relevant department or business unit to ensure fairness and independence. As required, the investigator may obtain specialist advice on matters outside their expertise. All employees interviewed by the investigator are required to assist the investigator in carrying out the investigation. The investigator will keep detailed records of all interviews conducted.

The Company recognises that individuals against whom a disclosure is made must also be supported during the course of an investigation. The Company will take every reasonable step to treat any person who is the subject of a disclosure, particularly during the assessment and investigation process, with natural justice and procedural fairness. An independent senior officer of the Company may be provided to the individual who is subject to the disclosure, for the purpose of providing support.

Where a person is identified as being suspected of possible wrongdoing, but preliminary inquiries determine that the suspicion is baseless or unfounded and that no formal investigation is warranted, the reporter will be informed of this outcome. The investigator will decide whether persons the subject of a disclosure should be informed that a suspicion of wrongdoing has been made but found to be baseless upon preliminary review. This decision will be based on a desire to preserve the integrity of a person so named, so as to enable workplace harmony to continue, and to protect the reporter where it is a bona fide disclosure.

Where an investigation does not substantiate the disclosure, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the disclosure must be handled confidentially.

Generally, where an investigation is conducted and the investigator believes there may be a case for an individual to respond to certain allegations, the investigator must ensure that the individual:

- a) is informed of the substance of the allegations;
- b) is given a fair and reasonable opportunity to answer the allegations before the investigation is finalised;
- c) has their response set out fairly in the investigator's report; and
- d) is informed about the substance of any adverse conclusions in the investigator's report that affects them.

Where adverse conclusions are made in an investigator's report about an individual, that individual has a right to respond to those conclusions prior to any action being taken by the Company against them. The Company will give its full support to a person who is the subject of a disclosure where the allegations contained in the disclosure are clearly wrong.

At the end of the investigation, depending on the nature and result of the investigation, a report may be submitted to the Group CEO (or to the Board if appropriate). The report will summarise the conduct of the investigation and the evidence collected, include conclusions about the extent of any non-compliance with the Company's policies and applicable laws and recommend action to remedy the non-compliance and, where



relevant, prevent recurrence.

4.3.3 Limitations of Investigation

There may be limitations on the above investigation process. The Company may not be able to undertake an investigation if it is not able to contact the reporter (e.g. if a disclosure is made anonymously and the reporter has refused to provide, or has not provided, a means of contacting them).

4.3.4 Keeping a reporter informed

Regular updates will be provided to a reporter on the progress of an investigation (including through anonymous channels if this is possible and appropriate). The frequency and timeframe for updates may vary depending on the nature of the disclosure. Generally, updates will be provided to a reporter during the key stages of an investigation, such as:

- a) when the investigation process has commenced;
- b) while the investigation is in progress; and
- c) after the investigation has been concluded.

4.3.5 How the Investigation Findings will be Documented, Reported Internally and communicated to the reporter

The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure. There may be circumstances where it may not be appropriate to provide details of the outcome or a copy of the report to the reporter.

4.3.6 Review of Decisions

The Company is not obliged to reopen an investigation once it has been concluded. However, if the Company decides that a review is required, the review will be conducted by an officer who was not involved in the original investigation. The Company will conclude a review if it finds that the investigation was conducted properly. The review findings will be provided to the Board and the Audit and Risk Committee.

4.3.7 Malicious Allegations

Whistleblowers are expected to have reasonable grounds to suspect and report improper conduct. Malicious allegations may result in disciplinary action.

5. Legislative References

Defend Trade Secrets Act (DTSA) Compliance: "Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing":

1. Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.
2. Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.

The Whistleblower Protection Act requires the California State Auditor to protect your identity and prohibits retaliation, intimidation, threats, or coercion by state employees that could interfere with your right to disclose improper activities.



6. Related Documents/Links/Contact Information

- Code of Conduct Policy

7. Version Control

Policy Owner	Reward	
Last Updated	28 June 2023	
Version	Description	Policy Author/Action Owner
V1	Re-Brand	Philippa Bradley

