

# **Code of Conduct**

Last revised: 3 June 2022









#### 1. General

#### 1.1 Introduction

As evidence of Oda's commitment to conducting business to the highest ethical standards, Oda has adopted this Code of Conduct (the "Code"). The Code reflects Oda's three behaviors: We care about people, We shoot for the stars, and We are here to stay. The Code applies for all entities in the Oda Group, from the parent company to every local subsidiary.

The principles set out in the Code are integral to our future growth and success. Oda shall operate in accordance with the principles provided by the Code, and the Code applies to all individuals acting on behalf of Oda, including every board member and all employees in the Oda Group.

We also hold our supplier to the same high standard as we hold ourselves, as reflected in our Supplier Code of Conduct.

# 1.2 Our approach to legal compliance and corporate responsibility

Oda acknowledges that in fulfilling its commitment to create value for our customers and shareholders, we need to take into account Oda's wider social and environmental impact on the companies' stakeholders. Oda actively promotes compliance with all applicable laws and regulations in every jurisdiction in which we do business. We also recognize the special importance of international standards on responsible business conduct, such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

# 1.3 Your responsibilities

Every employee is responsible to ensure their own compliance with the Code, both in letter and in spirit.

In practice this means to:

- Familiarize themselves with the Code and participate in required ethics and compliance training.
- Act in accordance with the Code and comfortably within Oda's ethical standards and within the law. If in doubt, ask and raise issues early.
- Confirm annually that they have read and will comply with the Code.

# 1.4 Responsibilities for leaders

We place special responsibilities on our leaders. They must, through their actions, demonstrate the importance of compliance and good ethical business conduct. Leading by example is critical and leaders must act on any suspected unethical behavior, communicate the requirements set out in the Code and provide advice with respect to its interpretation and application, and be available for employees who have ethical questions or wish to report possible violations.



Leaders are also responsible for creating an environment where people feel comfortable speaking up and asking questions without risk of retaliation.

#### 2. Raising Concerns

Oda is open, honest and accountable. We encourage employees, and others who we deal with, to come forward and raise good-faith concerns they may have about any aspect of Oda's work.

Employees should contact their direct leader, supervisor, or a relevant support function (such as People (HR), Legal, Compliance or Finance). Alternatively, employees can raise a serious concern anonymously, by using Oda's Speaking Up tool: <a href="https://oda.speakup.report/odaspeakup">https://oda.speakup.report/odaspeakup</a>. Oda's Speaking Up Policy can be found as an attachment to this Code.

SpeakUp is managed by an external third-party, and is available 24 hours a day. Reports are handled confidentially by Oda's Employee Representatives and reports can be made anonymously. Reports can be made in your native language, both written and through a voice message (which will be transcribed to ensure anonymity). Oda respects the rights of persons accused of wrong-doing and ensures that all investigations are conducted fairly and completely. Persons who report concerns in good-faith will not be retaliated against.

# 3. Business integrity

#### 3.1 General

Employees, board members and hired personnel must always act ethically and lawfully when representing Oda in any capacity. To mitigate the risk of Oda representatives being exposed to bribery attempts, we have included both anti-bribery and anti-corruption provisions in our Supplier Code of Conduct.

# 3.2 Bribery and Corruption

Oda conducts business fairly, in an open and transparent manner, and complies with group policies, applicable laws and regulations governing our business activities, worldwide. We conduct business and make decisions without any unjustified influence to or from a third party.

#### Bribery and corruption

Bribery and corruption in any form are prohibited.

Employees may not – either directly or via a representative or third party – give, promise, offer, receive, accept, or demand any kind of bribe or improper benefit to or from a third party, including public officials. An improper benefit is any advantage which has no legitimate business purpose, inconsistent with accepted business practice in the relevant context and thus, may be given to influence the



recipient's decision making. Such benefits can include money, gifts, travel, hospitality, entertainment, etc.

Oda does not permit facilitation payments (*Nw: tilretteleggingshonorar*) being paid no matter how small these may be, and prohibits trading in influence, which means offering an undue advantage to a third party in order to use his or her position to influence a decision-maker.

#### Gifts, hospitality and travel

As a general rule, Oda employees and representatives shall not offer, give, accept or receive gifts, except for promotional items of minimal value.

The giving or receiving of gifts or hospitality or other benefits, such as social events, meals and entertainment, may however be acceptable if there is a clear and legitimate business rationale behind it. Thus, it must always be done with clear intent, and be modest, appropriate, infrequent and transparent. The following thresholds must be observed:

- Gifts up to 50 Euros no more than twice per year. Any gifts, travel or hospitality above these thresholds must be reported to the employee's manager and logged in the company's gift log.
- Hospitality, such as social events, meals or entertainment may be offered if there is a legitimate business purpose involved, and the cost is kept within reasonable limits.
- Travel expenses for any individual representing Oda shall be paid by Oda, unless otherwise expressly cleared by management or leader.

Gifts, hospitality, expenses or other favors shall never be offered or received in connection with contract bidding, evaluation or award.

Contact your manager or People if you have any doubts regarding whether a gift or offer of hospitality is acceptable.

#### Donations, Sponsorships and Political Contributions

Oda maintains a neutral position on party politics and does not support, financially or otherwise, any political party or their candidates.

Sponsorships, donations and political contributions, in the name of or funded by Oda, must not be promised, offered or provided until they have been sufficiently documented, reviewed and approved by Legal, Compliance and the CEO. Donations, sponsorships and political contributions may only be given to legitimate organizations, with clear intent and be appropriate and transparent.

#### 3.3 Conflict of Interest

Oda makes business decisions in the best interests of the Oda Group and our stakeholders. We avoid situations involving actual conflicts of interest, as well as



those that give the appearance of conflict between personal interests and the interests of the group. Conflicts of interest may interfere with an employee's ability to conduct their duties in a fair and just manner and can impede their capacity to act ethically. Such conflicts of interest can expose Oda and individual employees to unnecessary risk and potentially damage the Oda's commercial interests and reputation.

Oda respects your right to manage your personal affairs and investments. However, we expect you to always act in the best interest of Oda when you are representing Oda. Oda employees must timely disclose any interest that they may have at the time of hiring or during employment that creates, or could create, a risk of a conflict of interest. For example, employees must report any ownership interests in competitors, suppliers, service providers (except if those are publicly listed companies) external activities, such as jobs, directorships, political appointments, or any other positions that could interfere with your duties to Oda.

Employees should disclose and discuss with their respective leaders any actual, potential or perceived conflict of interest. The leader will then decide and document with the People team whether any measures should be taken, for instance stepping back from the situation that caused the conflict of interest.

# 3.4 Marketing and advertising Integrity in business data

Oda builds long-term relationships with customers, suppliers and other third parties through honesty and integrity in all interactions. Marketing and advertising materials and other representations must always be accurate, truthful, and in compliance with all applicable laws and regulations.

We act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships. Taking unfair advantage of any third party through misuse of intellectual property, misrepresentation of material facts or any other illegal trade practice is prohibited.

#### 3.5 Fair competition

Oda competes fairly and with integrity. We seek competitive advantages through superior performance, not through unethical or illegal business practices. Oda only uses legitimate methods to gather information about its competitors. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent and similar actions are prohibited.

Oda does not exchange information, or enter into agreements or concerted practices with competitors or counterparts, in violation of any applicable competition laws or regulations. Price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities are prohibited. More information regarding fair competition can be found in Oda's policy on competition and anti-trust.



#### 3.6 Privacy and data protection

Oda places strong importance on the integrity and confidentiality of the personal data of our customers, employees and everyone with whom we do business. Personal data may only be used for appropriate purposes and must be safeguarded. Employees must comply with all applicable laws and regulations on privacy and data protection. All personal data shall be kept and stored in accordance with applicable data protection laws and regulations and internal requirements and guidelines. Through our Oda Privacy Champion initiative, we ensure that Oda has personnel in all functions and teams ensuring that privacy is part of the daily agenda and routines. More information regarding fair competition can be found in Oda's policy on competition and anti-trust.

3.7 Trade controls and sanctions

Oda sources products from countries and persons around the world. We do not enter into contracts with customers or suppliers who are listed as restricted persons or situated in a

restricted country in any applicable sanctions law. We comply with trade controls and screen all of our third-party vendors and suppliers to determine whether they are subject to trade sanctions.

Oda avoids any activity that can lead to Oda or any employee becoming listed as a restricted person in any sanctions act. Employees must comply with all applicable trade sanctions and may not knowingly and intentionally participate in activities whose objective or effect is to circumvent sanctions.

We hold our suppliers to the same high standard as we hold ourselves. Therefore, we have prepared a Supplier Code of Conduct, which describes the expectation we have to our suppliers.

# 4. Sustainability

#### 4.1 General

Sustainability at Oda is defined as contributing to the UN's 17 Sustainable Development Goals as well as contribution to the welfare of animals. It is about conducting business with respect for people and for our planet. We aim to meet today's needs, without compromising the ability of future generations to meet theirs. Thus, we consider both environmental and social factors in our decision making. Our perspective on sustainability is rooted in our behaviors highlighted in section 1 of the Code.

At Oda, sustainability is everyone's job. As a company we expect all persons and teams to be aware of their environmental and social impact and how they can work to improve it.



#### 4.2 Environment

We are committed to preventing harm to the environment, and long-term sustainable development is an integral part of Oda's business model. We act responsibly with an ambition to reduce direct and indirect negative influences on the external environment, and avoid them completely where possible. Our ambition is to develop our companies and our own operations into long-term sustainable businesses in line with the Paris Agreement. Oda strives to reduce the greenhouse gas emissions from our own operations, including business travel, to as close to zero as possible.

Oda and all employees, board members and hired personnel have a responsibility to comply with all relevant and applicable environmental laws and regulations, and also follow any internal guidelines and initiatives of Oda relating to reducing Oda's environmental footprint, including:

- Assess and communicate the impacts our activities have or may have on the environment.
- Ensure that relevant measures are taken into account when making business decisions, including the use of environmentally friendly technologies.
- Contribute actively to efficient use of resources, carbon efficient operations and prevention of harm to the natural environment.
- Assess and follow up results and contribute to continued improvement.

#### 4.3 Diversity & Inclusion

A diverse and inclusive work culture enables higher levels of innovation, learning, customer understanding, and culturally aware leaders and employees. Our continued success at Oda depends on our ability to attract, develop and retain a diverse workforce. We are committed to ensuring that the unique contributions each employee brings to the company are respected and stimulated, thus cultivating a workplace that fosters respect for all people including employees, customers, suppliers, contractors, consultants, and other business partners that reflects the diversity of the communities in which we operate.

Oda employees shall not be discriminated against on the basis of competencies, experience and performance regardless of age, race, gender, religion, nationality, disability, sexual orientation, marital or parental status, political opinion, union membership, or ethnic background.

# 4.4 Diversity and Inclusion in our hiring processes

We expect everyone acting on behalf of Oda to treat everyone with fairness, respect and not to base work-related decisions on characteristics that result in compromising the principle of equality rather than merits. Any unfair employment practice inadvertently hurts us all and we do not make any employment decisions that discriminate against race, color, national origin, ethnicity, religion, gender, sexual orientation, gender identity or expression, civil



union or marital status, age, citizenship status, disability status, pregnancy, medical condition or neuro-diversity. Besides Oda's fundamental belief in equal rights for all, Oda believes diversity and inclusion brings clear business benefits as it leads to greater team harmony, improved financial performance, higher degree of innovation, better decision making and creation of value over the long-term.

# 4.5 Human Rights

Oda recognizes its responsibility to respect international human rights standards in accordance with the UN Guiding Principles on Business and Human Rights. We aim to conduct its business in a manner which respects the human rights and dignity of people. We shall avoid directly causing or contributing to adverse human rights impacts and, where possible, seek to prevent or mitigate adverse human rights impacts linked to Oda through its business relationships.

When considering new investments, operations or activities, or when selecting suppliers and business partners, we review any associated human rights issues and consider how we can ensure that our operations do not come into conflict with any of these fundamental human rights principles.

#### 4.6 Treating colleagues with respect

We demand a work environment free from harassment, abusive conduct and bullying. We will not tolerate any form of inappropriate conduct that creates an intimidating, hostile, intolerant or offensive work environment. Harassment or bullying can include physical actions or verbal remarks/messages. Sexual harassment can involve unwelcome sexual advances, requests for sexual favors, or other physical or verbal conduct of a sexual nature. All forms of harassment, bullying and abusive conduct are prohibited and if you observe, learn of or experience abusive conduct or bullying we ask you to report it immediately to your leader, the People team or to an employee representative. We are committed to providing an inclusive environment and to be recognized for being a diverse and inclusive workplace. We will treat everyone with fairness, respect and dignity and do not tolerate any discrimination of colleagues or others affected by our operations. Discrimination includes all unequal treatment, exclusion or preference based on aspects such as race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin or any other characteristic that results in compromising the principle of equality.

We will not tolerate any form of harassment or actions that reasonably can be considered as offensive or intimidating, including any form of unwanted attention of a sexual nature.

#### 4.7 Behavior

Oda employees are not permitted to be under the influence of intoxicating substances, including alcohol and drugs while at work.



Oda supports the prohibition of human trafficking and purchase of sexual services. No sexual services must be purchased when working for or on assignment or business trips for Oda.

# 4.8 Upholding labor standards

All Oda employees are entitled to the enjoyment of their basic rights as protected under all applicable laws and regulations and should not be forced to suffer physically or mentally from their work in any way. All colleagues shall be free to peacefully and lawfully join or form trade unions of their own choosing, and should have the right to bargain individually and collectively.

All Oda employees shall know the basic terms and conditions of their employment. Employees with the same experience, performance, and qualifications should receive equal pay for equal work. Oda shall offer healthy and safe workplaces for all employees at all times. This applies to all aspects of working conditions. We expect you to treat everyone you meet through work or work-related activities in a respectful manner.

Oda shall comply with applicable laws, regulations, agreements, and industry standards such as working hours and compensation.

We expect the following from any employee, board member or hired personnel:

- Take responsibility to create and maintain a good working environment.
- Never engage in harassment, bullying, workplace violence or other behavior that colleagues or business partners may regard as threatening or degrading.
- Offensive messages, derogatory remarks and inappropriate jokes are never acceptable.
- Respect other people's customs or culture.
- Speak up if you observe or experience harassment or intimidating behavior.

#### 5. Use of Oda's assets

Oda's assets are dedicated to achieving Oda's business objectives. All employees are required to safeguard and not to misuse Oda's assets and resources in accordance with provisions as set out below:

- Information and technology resources (e.g., e-mail, computers, internet, phone, and the like) are Oda's property and are provided to employees solely for business use. Occasional personal use of these resources is allowed, but must be kept to a minimum.
- All employees are required to ensure that their business travel is intended to further Oda's business interests, and that travel expenditures are reasonable, prudent, and in accordance with applicable corporate policies.



- Intellectual property is subject to special protection through legislation. Employees must follow instructions from management on how they must act to protect this valuable asset.
- When an employee ceases to be employed by Oda, they must leave all Oda assets (including documentation and any media containing Oda proprietary information) in the possession of Oda without making any copies.
- Adopt and follow any security guidelines provided by Oda from time to time.

#### 6. Confidential information

Oda's confidential information is a valuable asset and may only be used for Oda's business purposes. We protect information created or obtained by us, to ensure appropriate confidentiality and integrity

Confidential information includes, but is not limited to, all financial information, business plans, technical information, and other types of information that has not been disclosed to the general public. Employees, both during and after their employment with Oda, have a duty to protect confidential information, and only disclose or utilize it as permitted by Oda.

Employees are expected to take reasonable precautions to ensure the physical security of confidential information and facilities, and to adopt and follow any security guidelines provided by Oda from time to time.

# 7. Financial Integrity 7.1 Insider Trading

Oda participates in the financial system and marketplace fairly and transparently. We protect information that may impact the price of our own or someone else's financial instruments, and only disclose it in accordance with applicable securities laws and regulations.

Comments about financial performance and prospects to external parties shall only be made by authorized official spokespersons of Oda. Employees may not, on their own account or on behalf of a third party, while in possession of inside information, trade in financial instruments, nor may Oda employees recommend or induce another person to conduct such trading. Employees who are listed on Oda's list of persons discharging managerial responsibilities must comply with the reporting obligations under the EU Market Abuse Regulation and are prohibited from trading in Oda's financial instruments during certain closed periods.

In the normal course of business, employees, agents, contractors and consultants of Oda may come into possession of inside information, and as such, shall be included in Oda's insider list of persons with access to inside information concerning Oda. Examples of information that can be considered as inside



information include unannounced financial data, intended mergers or acquisitions, unannounced products, marketing plans, vendor contracts, and procurement and manufacturing plans.

#### 7.2 Financial Accounts and Records

Oda accounts and reports financial information accurately and completely. We follow applicable accounting principles and implement internal controls and processes to ensure that accounting and financial reporting are accurate and compliant. Employees shall properly record, classify, and summarize transactions in accordance with Oda's accounting policies. Employees may not enter or remove information in Oda's books or records that intentionally hides, misleads, or disguises the true nature of any financial or non-financial transaction or result. Employees involved in financial reporting shall always provide full, fair, accurate, timely, and understandable disclosure in reports and documents that Oda files with, or submits to, government agencies or tax authorities, and other public communications.

# 7.3 Money Laundering

Money laundering is when a person or party hides illegally acquired funds – money or all other forms of assets – or tries to make such funds look legitimate. Money laundering also includes the use of legitimate funds to support criminal activity or terrorism.

Oda prevents and reacts promptly when detecting financial crimes, including money laundering and the financing of terrorism. We know our third parties, monitor transactions and raise suspicions early. Employees must ensure that appropriate due diligence is conducted on the third parties with whom they interact, and should report any unusual transactions to Legal & Compliance.

#### 8. Confirmation

All persons concerned by the Code of Conduct have to confirm that they have read and understood its contents and the fact that they are obliged to follow the Code. I hereby confirm that:

- 1. I have read and understood the Code and that I am aware of the fact that questions regarding the Code can be posted to my immediate manager or to the employee representatives of Oda.
- 2. I, since the date when I became aware of the Code, I have followed the Code.
- 3. I will follow the Code going forward.

\*\*\*



# Speaking up at Oda







Last revised: 3 June 2022

#### Introduction

At Oda we are committed to responsible business practices and to always act in accordance with our Code of Conduct and respective relevant laws and regulations. We want to behave with integrity and treat others with respect. However, during your work, you may be confronted with ethical concerns or dilemmas. If you observe something that worries you, or that seems to violate our Code of Conduct, we encourage you to speak up to help us address the situation proactively.

We understand that it takes courage to speak up, so therefore we are committed to providing you with an easy and safe way to raise your concerns. Speaking up is an essential part that enables us to protect our people, our company behaviors, our stakeholders and society as a whole. No one should be alone when dealing with an ethical dilemma. In this policy we clearly explain what your

options are and how you can raise your concerns.

#### Scope

This policy describes how you can speak up about suspected breaches of the Code of Conduct or laws and regulations. Furthermore, it describes the process, so that you know what to expect, and the ways you will be protected when speaking up (confidentiality, anonymity, non-retaliation). The Speaking Up policy applies to all employees and other key stakeholders.

#### When do I speak up?

As soon as possible, or as soon as you suspect that there has been a violation of the Code of Conduct or our company values. We do not expect you to have all the answers, and encourage you to use what is described in this policy as a reference point to determine if something is not right.



What should I speak up about?

We encourage you to speak up about suspected breaches of the Code of Conduct, or, when in doubt, about anything that does not constitute ethical, compliant or lawful behavior.

How do I speak up?

You can speak up, provide feedback or ask your questions in a variety of ways. For many matters, it can be a good first step to talk to the person involved directly. Thus, "speaking up" should not replace the direct dialogue that forms the foundation of our transparent company culture. However, we recognize that this is not always easy to do.

If this is not possible, or if you do not feel comfortable doing so, please turn to the SpeakUp channels as described below:

 Speak up to your manager or your manager's manager, either directly or through Peakon.

If this is not possible, or you do not feel comfortable doing so,

2. Speak up to People, Q&A and Compliance or Legal.

If this is not possible, or you do not feel comfortable doing so,

3. Speak up via the "SpeakUp" system.

The SpeakUp system is operated by an independent service provider and is available 24/7. Via the SpeakUp system you can speak up or ask questions directly to the SpeakUp office. You can speak up in your own

language, via <a href="https://oda.speakup.report/odaspeakup">https://oda.speakup.report/odaspeakup</a> or the mobile app. You can decide to remain anonymous.

Reporting outside the company?

If, after careful consideration, you do not feel comfortable to speak up within the company or through the SpeakUp reporting system, it is possible to raise your concern outside the company to a public supervisory authority or public authority. Whenever you considering such a significant step, we strongly recommend you to seek advice and not do this alone. Above all, we encourage you to speak up within the company. This way you can hand the burden over to us, and we have the opportunity to look into the matter immediately.

I spoke up. Now what?

If you submit a report, the SpeakUp Office send will you acknowledgement of receipt within seven days. Your report will be evaluated and assessed third-party recipient (currently PwC) and a representative from the People and Legal teams at Oda. Only qualified persons will receive the report. Sometimes you will be asked follow-up questions. You will receive feedback within (ultimately) three months after the acknowledgement of receipt. During this time you will be informed on the status of the complaint. Please note that we may not always be able to give you details of the outcome of investigation for reasons of confidentiality, privacy and the legal rights of the involved parties. All parties involved, including the



accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g. mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.

# Protecting you, speaking up

Protecting your right to speak up is essential. Protecting you as a reporter is one of the main purposes of this policy. Below, some key principles are highlighted:

#### Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Depending on the purpose of sharing, the SpeakUp Office will (further) anonymise the information prior to sharing Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake.

In principle, we are obliged to inform any person under investigation that he or she is the subject of a report being investigated as soon as possible (this may be delayed if there is a substantial risk that this notification jeopardizes the investigation or the gathering of

evidence.). Your identity will not be disclosed.

Regardless of all measures taken to protect your confidentiality, it can never be fully guaranteed that during the course of an investigation you will never be implicated by subjects.

#### **Anonymous**

You share information can anonymously by using the SpeakUp Line. Please note that the SpeakUp Office has - in addition - also the responsibility to anonvmize information that comes in, in order protect your identity. SpeakUp Line makes safe dialogue possible in an anonymous way. An anonymous letter does not offer any possibility of further correspondence, hence any anonymous letter or e-mail outside the SpeakUp line will - in principle - not be handled.

### Safeguarding your Privacy

Oda is committed to protecting the privacy of everyone involved in the Speaking Up process. We will do everything within reason personal safeguard data unauthorized access and processing. Any personal data obtained will be processed in line with our and SpeakUp's privacy policy and will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

#### Non-retaliation

Any person that speaks up is protected from retaliation. The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be



tolerated. Any form of threat or retaliation aimed at those speaking up may lead to disciplinary measures. If you notice or experience any retaliation, you can report this via one of our Speaking Up channels.

# Protecting you, as the accused

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. Oda is responsible for protecting the rights of anyone who is accused – or otherwise involved – in any issue.

# Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

#### Solid Investigation procedures

The Oda is responsible for solid, confidential and precise fact-finding. This will normally be conducted through an investigation; either conducted by internal or external parties.

#### Information Rights

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

# Right to Defend and Appeal

After the facts are determined, the accused receives an opportunity to not only give a statement (responding to the accusations) but also have the right to comment on the draft findings. The subject has the right to appeal against the fact that he or she is subjected to during the time that the report is being investigated.

### Speakup: a Dialogue

We selected the SpeakUp system as it allows for anonymous dialogue with the reporter. The SpeakUp Office has the right not to proceed with a case due to limited information. A procedure is in place for this.

#### Misuse of the policy

We take the practice of reporting in bad faith or any other form of misuse of this policy very seriously. This act is considered to be a serious breach of the Code of Conduct and disciplinary actions will be taken.

Not satisfied with the SpeakUp process

If you believe your concern has not been handled in accordance with this policy, if you are not satisfied with the follow-up and/or the outcome of your report, or if you do not feel protected, please report this directly to Oda or through the SpeakUp Line.

\*\*\*