

Gofore Whistleblowing Policy

Introduction

Gofore and its Group companies' (together "Gofore") mission is to change the world for the better. We build a better future with our work in digital transformation and renewing ways of working. We pursue projects that have significant positive impact to both the society and the environment.

We are committed to being socially, environmentally and financially responsible – we care for our people, our customers, and the surrounding world.

At Gofore, we see open communication and transparency as important parts of ethical conduct. We want to be informed quickly of any potential unethical acts so that we can deal with them quickly and effectively.

The purpose of Gofore's Whistleblowing Channel is to provide stakeholders of Gofore Group, in a work-related context, with the possibility to report illegal, corrupt and/or unethical activities, whether with full anonymity or – at their choice – with a name.

Gofore will protect eligible whistleblowers, by not disclosing a person's identity and ensuring the person is not subject to any retaliation and processing any reports filed via Whistleblowing Channel confidentially, impartially and independently.

Gofore's Whistleblowing Channel meets the requirements of the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law ("Directive") and applicable national laws.

Who can act as a whistleblower?

The protection provided by the Directive applies to persons (both natural and legal) related to Gofore Group who in their work-related activities have information on a breach or suspect a breach of applicable laws, regulations or rules that has occurred or is likely to occur at Gofore, and who report such actual or potential breach via Gofore's Whistleblowing Channel.

In accordance with the Directive, such a person may be Gofore's employee or previous employee, director, freelancer, contractor, job applicant, trainee, supplier or other business partner (or their employee or subcontractor) or Gofore's shareholder.

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Breaches falling within the scope of Whistleblowing Channel

In accordance with the Directive, breaches falling within the scope of the whistleblowing channel include breaches in the following areas:

- Public procurement
- Financial services, products and markets, and prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data, and security of network and information systems
- Breaches affecting the financial interests of the Union
- Breaches relating to the internal market, including breaches of Union competition and State aid rules as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.

Gofore's Whistleblowing Channel is not meant for reporting:

- i. Personal employment-related issues, such as harassment, inappropriate or disruptive treatment or behavior at work or other such issues concerning occupational safety, as these matters may not be appropriately investigated in the context of the whistleblowing system. For reporting any such behavior or misconduct, it is recommended to follow the internal instructions provided by Human Resources available at Confluence – [LEARN MORE](#).
- ii. General ethical dilemmas (unless they fall within the scope of the categories listed above). For such dilemmas, Gofore has established Ethics Desk to provide internal support for ethical consideration and decision making. Read more about Ethics Desk at Confluence – [LEARN MORE](#).
- iii. General feedback to Gofore which you can always provide through our website – [CONTACT US](#).

How to blow the whistle?

Gofore is using Granite Whistleblow – an ISO 27001 and GDPR compliant, secure and user-friendly whistleblowing channel that meets the requirements of the Directive.

Whistleblower can access Gofore's Whistleblowing Channel [HERE](#).

Whistleblower can file a report on suspected breach and its potential perpetrator anonymously through Gofore's Whistleblowing Channel. The whistleblower will receive a link and a PIN code to have an anonymous conversation with the processor of the report. No logs are created for activities performed by anonymous whistleblowers.

Whistleblower may also, at her or his own choice, choose disclose to the identity fully to the ones authorized to receive and process the report. All reports coming through Gofore's Whistleblowing Channel are confidential meaning that Gofore has the obligation to protect and keep your identity and the identity of any third party possibly mentioned in your report confidential.

Who will process the report?

Gofore is committed to ensure confidential, impartial and independent processing of any report received via Gofore's Whistleblowing Channel.

Gofore has named a Whistleblowing Team consisting of Gofore's:

- Chair of the Board of Directors
- CEO
- CFO
- General Counsel
- Director of People Operations
- Member of the Ethics Desk

The team has been designed so that reported cases can be reacted quickly, investigated impartially and confidentially. Further, the team represents competence to undertake measures and decisions to promptly end any and all breaching conduct and activities on a case-by-case basis, and to decide on further measures in the manner most appropriate for the situation in question.

In case it is necessary for the purposes of ensuring that no conflict of interest exists or that adequate expertise is available for the processing of the report, the Whistleblowing Team may involve more internal or external processors for the investigation of the report.

Receiving and processing of the report

All whistleblowers will receive confirmation of receipt of their reports as soon as their reports have been received (typically an automatic acknowledgement of receipt via Gofore's Whistleblowing Channel), and at the very latest within seven (7) days of delivery of their reports.

Gofore's Whistleblowing Team will receive and process the reports, and may also request further information from whistleblowers through the Whistleblowing Channel. Whistleblowers are not obliged to provide further information, however, we recommend doing so in order for the processors to be able to investigate the matter appropriately.

Whistleblowers will receive feedback concerning their reports within three (3) months from the acknowledgment of receipt of the report. Feedback means information on the measures taken or to be taken by Gofore and the grounds for the choice of those follow-up actions.

Gofore will analyze the reported incident impartially and independently, and determine on possible necessary interim measures and finally, after investigating the incident thoroughly, decide on appropriate measures and follow-up.

Data Protection

Gofore will comply with the applicable data protection laws when processing personal data within the context of the whistleblowing system. Read more from the [Privacy Statement for Gofore's Whistleblowing Channel](#).

Amendments and Updates to the Policy

This Whistleblowing Policy will be approved and reviewed, from time to time (and at least once a year) by the CEO of Gofore Plc. Minor updates, such as technical and terminological amendments, may be made by persons authorized by the CEO of Gofore Plc.

Version	Date of Approval and Approved by
Drafted	28 March 2023 (applied as of 1 April 2023), The CEO of Gofore Plc