

Trifork Group Whistleblower Protocol (2021)

The entire Trifork Group (Trifork Holding AG together with its direct and indirect subsidiaries ("Trifork")) operates a transparent and fair business with respect to democratic rules and enables trust in people. We are committed to detect and prevent fraud, misconduct, breaches of security and data protection, etc.

All employees, executive management and the board of directors of Trifork as well as other persons doing business with and/or advising Trifork are encouraged to report any breach of the Trifork Code of conduct and suspicious acts or omissions that could harm our employees, Trifork, customers and the society we are a part of, as Trifork adheres to the Ten Principles of the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>).

With your help, we can ensure Trifork's continuous integrity, trust and reliability which are values we have been highly committed to since the foundation of Trifork.

What should be reported?

Whistleblowing may only be used to report significant findings such as (not an exhaustive list):

- **Violations against local laws e.g. financial fraud**, economic crime, including bribery, fraud and forgery etc.
- Severe misconduct in **business ethics**
- Severe breach of **security or data protection**
- **Sexual harassments**
- Other findings considered relevant by the whistleblower eg. **breach of Trifork Code of Conduct**

The whistleblower system may only be used for filing reports in good faith so please consider safeguarding our culture of trust, integrity and dialogue. This whistleblower protocol is not meant to replace the "Open Door Policy". You are always welcome to talk to a Business Unit Leader or Trifork Holding AG management.

How to file a report?

We have mandated an external legal counsel to oversee the whistleblower filings ("Whistleblowing") and the Investigation team handling the process. Please report incidents in writing on <https://trifork.com/whistleblower/> where our chair of the board of Directors, the Chief Legal Officer and the external legal counsel will receive the report ("Investigation team"). You can also contact the external legal counsel directly by email (merenda@memo.law), by post (memo.law AG, attorney-at-law Rahel Merenda, St. Andreas 7, CH-6330 Cham) or you can call (+41 41 552 77 77).

As a Trifork employee we encourage that you initially contact your business unit leader, provided that you feel comfortable disclosing it to him/her. We encourage you to disclose your identity when reporting as our external legal counsel is instated to ensure fair and unbiased treatment of all filings, but you can choose to stay anonymous, because all filings are treated in a confidential manner.

Please state an e-mail address/phone number for further contact from the investigation team. If you want full anonymity then use a non-personal- or business-related e-mail address and state you prefer full anonymity.

Responsibilities and Investigations

All filings sent to the Investigation team on suspected fraudulent or dishonest conduct is with reference to the Chair. Reasonable care should be taken in dealing with suspected misconduct to avoid

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law

Due to the important, yet sensitive, nature of the suspected violations, effective professional follow-up is critical. Business unit leaders should not perform any investigative or other follow-up steps on their own. Accordingly, a business unit leader who becomes aware of suspected misconduct should report it to the Investigation team, and should not without prior permission take steps on his or her own to do any of the following:

- Contact the person suspected to further investigate the matter or demand restitution
- Discuss the case with attorneys, the media, or anyone other than the Investigative team

- Report the case to an authorized law enforcement officer without have Trifork discussing the case with the Investigation team

Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed by the Investigation team or/and external experts designated by the Chair or the Board. This may include an investigation by legal counsel and/or accountants in some instances. All investigations will be kept confidential to the extent feasible. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person and his or her supervisor.

Whistleblower Protection

- Trifork will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that Trifork can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)
- Employees, consultants, and volunteers of Trifork may not retaliate against a whistleblower for informing management about an activity which that person believes in good faith to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Chair. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations. Allegations that are baseless and not made in good faith may result in disciplinary action.

Accepted by the Board of Directors Trifork Holding AG on may 17 2021.