

Company IDV Group	SPEAK UP POLICY - COMPANY POLICY		
Function Legal, Compliance	Version 1.0	Effective Date 01.01.2026	Pages 7

Key Points to Remember

- We make our voice heard because we believe speaking up is an essential part of our culture of excellence. Speaking up is part of our jobs, expected and always welcomed.
- We speak up when we need guidance or advice, when we have experiences to share, or when we see things that can be improved or that are wrong.
- You don't need to have proof to speak up.
- The Company provides several ways to speak up, including the Compliance Helpline. If we want, we can remain completely anonymous.
- The Company confidentially investigates reports of suspected misconduct and takes appropriate remedial actions, including disciplinary measures. The main objective is to understand what happened, to correct the situation and to prevent it from happening again.
- The Company protects against retaliation the reporter who speak up in good faith (being an employee or any stakeholder) and anybody cooperating in an investigation. We conduct retaliation checks and stop retaliation when it's proven to be happening.
- Speaking up helps us continuously improve, learn from our mistakes and stop things that are wrong before they can jeopardize our collective hard work.

The Purpose of this Policy

This Policy explains:

- why speaking up is important;
- how we can speak up; and
- what we can expect when speaking up.

Who Must Follow this Policy

All directors, officers and employees of IDV Group and its subsidiaries (the Company) must follow this Policy.

This Policy also applies to Company's stakeholders or third parties (such as customers or suppliers) entering into a relationship with the Company as well as to all those engaged in activities on behalf of or in the interest of the Company (for example, contractors or temporary workers).

If we engage a contractor or temporary worker, we must make them aware of this Policy and of the Company's expectations that they will speak up in line with the principles set out in this Policy.

Why this Policy is important for IDV Group



It's Our Culture - Speaking up is an essential part of our culture and supports our sustainability and our success. Speaking up is a normal part of all our roles, is expected, and is always welcomed.

It's our Commitment - We have committed to one another, to all of our stakeholders, and to society, that we operate according to high ethical and compliance standards in all jurisdictions. When something threatens this commitment, the Company depends on us to speaking up to identify and address potential issues.

It Protects the Company - Speaking up protects the Company, and all of us as individuals, from legal, financial and reputational risks.

We Learn from Mistakes - Speaking up is essential to help us understand why things went wrong and to prevent future misconduct or failures.

Definitions

Company or IDV Group – the IDV Group and its subsidiaries.

Compliance Allegation - An allegation made by a person, including third parties, that constitutes a Compliance Violation if substantiated.

Compliance Violation – An act or failure to act that violates the law, the IDV Group Code of Conduct or the principles and practices of one of the Company's Policies, including this Policy.

Bad Faith Compliance Allegation - A Compliance Allegation that is made knowing it to be false or deliberately misleading.

Retaliation - An adverse act made in response to and against another person who speaks up or seeks to do so in good faith about a suspected Compliance Violation or cooperates with a Compliance investigation.

Investigation Oversight Sub-Committee – It is a committee which members are Human Resources, Internal Audit and Legal & Compliance. The committee provides an oversight on the investigation process and on the corrective actions, mainly on material investigations.

Key Principles

We are all responsible for speaking up about actual or suspected Compliance Violations.

We can speak up through a range of channels (see below) and choose to do it anonymously



if we prefer.

We are all required to cooperate with Company investigations into Compliance Allegations and protect confidentiality. The Company does not tolerate any type of obstruction to an investigation.

The Company investigates all Compliance Allegations according to established standards and takes appropriate remedial actions, including increased controls, training, disciplinary measures and communication.

The Company conducts retaliation checks and takes action where necessary. IDV Group does not tolerate any form of retaliation against anyone who reports a concern in good faith or cooperates in an investigation. IDV Group conducts retaliation checks to prevent or detect retaliation. When we find someone is engaging in retaliation, or causing someone to fear retaliation, we address it, rapidly and with the upmost severity.

Failure to speak up or report up a suspected Compliance Violation, obstruction of an investigation, Retaliation and Bad Faith Allegations may be evaluated as Compliance Violations.

Nothing in this policy prevents you from reporting a situation to competent authorities.

The Investigation Oversight Sub-Committee exercises reasonable oversight of investigations and proposed remedial actions to ensure fairness and consistency.

The Ethics & Compliance Committee reviews periodic reports on speaking up and Compliance Violations to ensure continuous improvement, learning from mistakes and avoiding repetition of misconduct and failures.

When We Should Speak Up

You should speak up in any of the following situations:

- You know of, or suspect, a situation where a Compliance Violation has occurred or may happen;
- A third party makes you aware of a situation where a Compliance Violation has occurred or may happen;
- You know or believe that you may have engaged in a Compliance Violation. Doing so demonstrate good intentions, and the Company will consider this as a mitigating factor;
- You believe that you, or someone else, has suffered retaliation;
- You need guidance or clarification on a matter related to the Company's compliance and ethics program.



Do not wait to speak up. Early speaking up can help prevent further harm, protect people and the Company's reputation.

To speak up, you must act in good faith and have a reasonable belief that something is probably wrong.

It is important to speak-up if you see or are aware of a compliance Violation involving others. The effectiveness of our Company Compliance Program also depends on all us to speak up.

How We Should Speak Up

The Company provides a number of options that enable us to speak up.

Supervisor - many people talk to their supervisor when they wish to speak up and this is often the quickest and most effective way.

Department Heads – Your manager knows how to assist you when speaking up and will support you to do so.

Human Resources – the HR team will be able to assist with speaking up and refer the matter to the appropriate person, if they cannot deal with it directly

Legal & Compliance – You can speak up to the Legal, Compliance & Corporate Governance Department.

Compliance Helpline - operated by a third-party, available 24 hours a day, also through dedicated phone numbers. Details are available on the Compliance Helpline website at: <https://www.idvgroup.com/compliance-helpline/> through the channel "Helpline to IDV Group".

You can speak up anonymously using the Compliance Helpline.

What to Expect When Speaking Up

Contact – The Company investigator appointed for the case will contact you in confidence to understand the concerns and discuss the next steps.

Confidential Investigation - The Compliance function oversees all investigations into Compliance Allegations according to established standards as provided in the Investigations Guidelines. Investigation information is accessible to authorized personnel only, i.e. Compliance, management and senior management on a need-to-know basis. We should not commence an investigation without the approval of Compliance.



Outcome – The Compliance team makes recommendations on measures to stop and prevent repetition of misconduct, taking into account all facts established, the surrounding circumstances, as well as mitigating and aggravating factors. Role and/or seniority can be relevant factors. The Compliance team will also validate that any disciplinary sanctions are consistent, regardless of location, function or role.

Closure – The Company’s appointed investigator will contact you when the investigation is finished, so that you know the Company has addressed the matter. The Company will not provide information that violates anyone’s privacy. Preventing future misconduct is a key objective of Compliance investigations. You should expect misconduct to end following an investigation. Speak up if you believe this is not the case.

Respect and Fairness – IDV Group has no tolerance for disrespectful or unfair behaviors. You should expect respectful and fair treatment at all points during and after the investigation. Speak up if you believe this is not the case.

Redress - If we do not meet one of these expected actions, please contact Compliance immediately.

What Is Expected From Us When Someone Speaks Up

Cooperation - We are all required to cooperate with Company investigations into Compliance Allegations by attending interviews, providing documents and maintaining appropriate confidentiality, as requested, and being truthful and forthcoming. You must not obstruct an investigation.

Report Up – If someone speaks up to you about a concern, then you have responsibilities:

- Recognize speaking up is the right thing to do and do not discourage it, ever.
- Listen, ask relevant questions and take notes if necessary.
- Report up the information to the Compliance team immediately.
- Maintain confidentiality: do not share any information related to the matter with anyone else.
- Do not investigate the matter on your own. Of course, take necessary action to protect people and assets from immediate harm.

Retaliation – Retaliation against anyone who has spoken up, or cooperated with a Company investigation is a serious Compliance Violation in itself. Do remember:



- Protect those involved from retaliation and speak up if necessary.
- Be mindful about how your actions, or behaviors could be misperceived as retaliation.
- Do not make any adverse employment-related decision about anybody who you know is, or may be involved in or cooperates with a Company investigation; put the decision on hold and contact Compliance and Human Resources first.

Exceptions

There are no exceptions to this Policy.

Ask Questions and Give Feedback

If you have any questions regarding the content or the interpretation of this Policy, please contact the Compliance team.

External Reporting

With reference to external reporting to the competent authorities make reference to [IDV Group Speak Up Policy Schedule1 English.docx](#).