

temenos

**Anonymous Reporting
Policy and Guidelines**

1. Introduction

Anonymous reporting means raising a concern about suspected wrongdoing that is taking place in our workplace. It is relevant to all Temenos entities and all its employees. This is because every business faces the risk of things going wrong internally. Where such a risk arises, it is usually the employees like you who are the first to realize or suspect wrongdoing.

Temenos and its management are committed to promoting and maintaining highest ethical standards, ensuring that where problems are identified they are resolved quickly.

This policy is designed to:

- support our values;
- ensure employees can raise concerns without fear of suffering retribution; and
- provide a transparent and confidential process for dealing with concerns.

2. Circumstances where you may wish to raise your concerns

You may wish to raise a concern where a fellow employee (including a direct manager or member of management) or group of employees' actions or anticipated actions may have an adverse, negative, or damaging effect on:

- The Temenos Group, its assets and/or our reputation;
- Our shareholders or customers;
- Our employees;
- The general public;
- The environment.

As well as all Temenos employees, this policy applies to external consultants and employees of our service providers working on our projects or any other individual working on Temenos projects at any of our customers' sites.

Examples of the type of actions which you may wish to raise concerns about are (but not limited to):

- Violation of the Business Code of Conduct;
- A criminal offence, such as fraud or theft;
- Leak of confidential information;
- A failure to comply with legal obligations, such as breach employment law or human rights obligations;

- Victimization, harassment or bullying;
- An actual, potential or perceived Conflict of Interest;
- Where the Health and Safety of any individual or group has been (or is likely to be) put at risk;
- Deliberate concealment of any of the above.

Where your concern is of a private/personal nature e.g. relating to your own Terms and Conditions of Employment, you should bring these types of concerns up with your line manager or by following the exception reporting process laid out in our internal policies/procedures.

There may be exceptional circumstance(s) where you have been asked to, or unintentionally or unwittingly committed a wrongdoing, or it could be that you are already implicated and wish to now 'blow the whistle'. In these circumstances, if you report and actively co-operate with an investigation in which you may be implicated in any wrongdoing, this will be taken into account when discussing and deciding on any disciplinary proceedings.

3. Procedure for raising a concern

You should in the first instance raise your concerns with your line manager, however, if you believe they are involved in an action that causes you concern in any way you should raise it to the line manager of your line manager, up to the Executive Committee member responsible for your function and HR.

If you feel unable to raise your concern with your line management, you may wish to contact any of the following managers:

- Regional HR or Chief People Officer
- Chief Legal Officer
- Group Head of Internal Audit

You may raise your concern using any of the 3 methods listed below. You should make it clear from the offset that you are raising your concerns under this Anonymous Reporting Policy. Any concerns or issues raised under this policy are known as 'disclosures'. Whichever method you chose to report your concerns we will preserve your anonymity and maintain confidentiality.

- **Raising your concern verbally**

You may wish to raise your concerns in the first instance verbally with your line manager or any of individuals covered in Section above. During this conversation the person hearing your concerns may wish to document the key points for future referral, using the form provided in this policy. You will be provided with a copy of this form.

- **Raising your concern in writing**

If you are uncomfortable raising your concern verbally, you should send your disclosure in writing using the form provided in the Policy, to any of the individuals covered in the section above.

- **Raising your concern to anonymous reporting channel**

Although it is preferable to raise concerns with management or HR in a first instance, there is no obligation to do so and you are at liberty to go directly to the Group Head of Internal Audit through the anonymous reporting web-based system with written or voice message in English language: <https://whistleblowersoftware.com/secure/Temenos-Anonymous-Reporting-Channel>, or the email address: anonymousreporting@temenos.com, or direct phone number (+40 (0) 317 11 2458).

The web-based anonymous reporting system: <https://whistleblowersoftware.com/secure/Temenos-Anonymous-Reporting-Channel> and the anonymousreporting@temenos.com email address is accessed only by the Group Head of Internal Audit. The Group Head of Internal Audit reports functionally to the Audit Committee which is independent of executive management. All disclosures made to the Group Head of Internal Audit, along with results of investigation and actions taken are reported to the relevant Executive Committee member, the Ethics Committee and ultimately to the Audit Committee.

4. Procedure for responding to your concern / Anonymous report

If you tell us in good faith about a concern, you can be assured that:

- You will be treated fairly and any matter will be taken seriously;
- We undertake that no one involved in the investigation will victimise you; and
- We undertake that you will not lose your job because you did so.

We are committed to investigating disclosures fully, fairly, quickly, and confidentially where circumstances permit. When you raise a concern, it will be acknowledged within five working days and appropriate arrangements for investigation will be made.

It is the responsibility of Temenos to determine how to investigate/handle such matters, depending on its view of the seriousness of the issue, validity of the concern and the ability to obtain the necessary information.

Employees who have raised concerns internally, will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required. We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.

In order to give full and fair consideration to your disclosure it is likely, that as part of any investigation, one or more fact finding meetings will take place with you. These meetings may take place 'offsite' if it is felt appropriate. The length and scope of the investigation will depend on the subject matter of the concern you have raised. In most instances, an initial assessment of the concern will be made to determine whether there are grounds for a more detailed investigation to take place or whether it is, for example, based on mistaken information.

The investigation results will be reported by the investigation team to the Ethics Committee members and recommended actions agreed.

5. Keeping you informed

So far as we consider it appropriate and practicable, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent us from giving you specific details of the investigation or actions taken, in which case the investigation completion will be communicated to you without further details.

We recognize that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate. Where this happens, we will endeavour to protect your identity as per section 6 of this policy.

It is not normally appropriate to set a specific timeframe for completion of investigations in advance, as the diverse nature of disclosures contemplated makes this impractical. We will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.

If you have raised a concern under this policy and you are not satisfied with the investigation or its conclusion, at your request to Group Head of Internal audit, your case will be escalated to the Ethics Committee. You will have the opportunity to state the grounds upon which you believe that the company should reverse its decision or re-open the investigation. Ethics Committee's decision is final and binding.

6. Anonymity and confidentiality

By raising a concern about wrongdoing, you may assume that only those individuals in charge of investigation will know your identity. Your identity will not be revealed outside of this group except:

- Where we are under a legal obligation to do so.
- Where that information is already in the public domain;
- On a strictly confidential basis to a professionally qualified external lawyer for the purposes of obtaining advice.
- To the police or as otherwise required under anti-money-laundering or other requirements.

If there are any other circumstances in which we are required to reveal your identity outside those identified above, we will discuss this with you first. Under no circumstances will we reveal your identity to anyone else i.e. outside the above list, without informing you first.

Likewise, you have a duty of confidentiality to us, and you should not disclose information about the nature of your concern to anyone either internally or externally who is not involved in any investigation/action being taken.

7. Data Privacy

Regulations and guidelines on whistleblowing are designed to provide specific protection to the person making use of the whistleblowing scheme (“the whistleblower”). Similarly, any individual that may be implicated in any complaint, investigation or whistle-blower report is entitled to the rights (s)he is granted under applicable provisions of national laws (including but not limited to those granted under the Directive 95/46/EC or GDPR from 2018).

Temenos ensures that the applicable data protection rules (as outlined in Temenos’ data protection policy) are upheld throughout the process e.g. Data Subject Rights will be respected at all times.

Appendix

Part 1 - Employee Section

You may use this form to register your concerns under our Anonymous Reporting Policy.

Name:

Do you wish your identity to be protected? – Yes/no

Department:

Telephone number:

(This may be an external/ mobile number).

Nature of Concern:

If you require more space, please use a separate sheet, and attach.

Your signature:

Date:
