



## **Working with Integrity Policy**

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## Document History

| Author              | Version | Date                           |
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| Jayde Tipper        | v1.0    | 28 <sup>th</sup> November 2022 |
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### Comments:

v 1.1 -Updated with descriptions of psychological safety and retaliation; modernized tone.

### Purpose of Policy

This policy sets out Temenos' expectations for respectful behaviour, explains how concerns can be raised, and describes how Temenos will respond to reports of bullying, harassment, sexual harassment and retaliation. Its purpose is to help prevent harm, encourage early speaking up and support a psychologically safe workplace.

### Working with Integrity Principles

At Temenos, working with integrity means treating people with dignity, respect and fairness, and helping to create a workplace where everyone can do their best work.

These principles ask each of us to be thoughtful about our impact on others, to speak up when something does not feel right, and to respond to concerns with care, openness and accountability.

The detailed expectations, reporting routes, protections and responsibilities that follow explain how these principles apply in practice.

This policy does not form part of your contract of employment, and we may amend it at any time.

Because this is a global policy, it sets a common minimum standard for respectful behaviour across Temenos. Local laws, policies or procedures may provide additional rights, obligations or routes of reporting. Where local requirements are stricter, they should be followed.

### What psychological safety looks like at work

Psychological safety means people feel able to speak honestly, raise concerns and ask for help without fear of embarrassment, retaliation, or negative consequences. It does not mean avoiding difficult conversations. It means handling those conversations with respect, care and fairness.

In practice, psychological safety can look like:

- A colleague feeling able to say, "That comment made me uncomfortable," and being listened to respectfully.
- A manager responding to a concern with "Thank you for telling me, let's talk about what support you need," rather than dismissing or minimizing it.
- Someone asks a question about behaviour, policy or expectations without being made to feel foolish.
- A team member challenges a joke, message or decision that feels inappropriate, and the team takes it seriously.
- A bystander checking in privately with someone affected by behaviour and helping them understand their options.
- Leaders acknowledge mistakes, course correct and make it clear that respectful challenge is welcome.

### What is retaliation?

Retaliation is any disadvantage, threat, exclusion, negative treatment or adverse action taken because someone raised a concern, participated in an investigation, supported another person, challenged inappropriate behaviour or exercised a right under this policy.

Examples may include, but are not limited to:

- excluding someone from meetings;
- withholding opportunities;
- hostile treatment after a report;
- negative performance consequences because a concern was raised.

### What is harassment?

Harassment is unwanted behaviour that affects someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It can be spoken, written, physical, visual, online or non-verbal. It may happen once or repeatedly, directly or indirectly. The intention behind the behaviour is not the only issue; the impact on the person affected also matters.

Sexual harassment is unwanted behaviour of a sexual nature that affects someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This may include unwanted sexual comments, jokes, gestures,

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messages, images, invitations, touching or pressure for sexual attention. In the UK, employers have a proactive duty to take reasonable steps to prevent sexual harassment, including risks involving third parties. Temenos applies this prevention-led approach as a practical global standard, subject to local law.

Examples of harassment or sexual harassment may include, but are not limited to:

- Using slurs, stereotypes, nicknames, or language that demeans someone's identity, background, beliefs, appearance, disability, age, sex, sexual orientation, gender identity, family status or other personal characteristics.
- Excluding someone professionally or socially, including from meetings, chats or informal channels.
- Physical intimidation such as pushing, grabbing, blocking, physical threats or aggressive gestures.
- Sharing, displaying or sending offensive, sexual, discriminatory, or degrading material or comments in person, by email or text, in group chats, on video calls or on social media.
- Unwanted sexual comments, propositions, jokes, banter or remarks about someone's body, private life or identity.
- Sexual advances, unwanted touching, or pressure for personal or sexual contact, or treating someone less favorably for rejecting or submitting to it.

Comments such as "it was only a joke", "that is how we talk here" or "no offence was meant" do not make behaviour acceptable. If someone tells you that your behaviour is unwelcome, listen, reflect, and change it. A respectful workplace is one where concerns are taken seriously and people are supported to prevent harm.

## What is bullying?

Bullying is behaviour that is offensive, intimidating, malicious, insulting, undermining or abusive. It may involve the misuse of power or influence, and it can make someone feel belittled, humiliated, threatened, isolated or unable to do their best work.

Workplace bullying usually takes one of three forms: physical, verbal, or indirect. It can range from extreme forms such as violence and intimidation to less obvious actions, such as professional or social exclusion.

Examples of bullying may include (but are not limited to) the following:

- Shouting or swearing at colleagues in public or private;
- Spreading malicious rumors;
- Inappropriate derogatory remarks about someone's performance;
- Physical or psychological threats;
- Constantly undervaluing effort;
- Rages or tirades

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- Ignoring or deliberately excluding people.
- Overbearing and intimidating levels of supervision.
- Excluding someone from virtual meetings, group chats or informal online channels, or persistent out-of-hours messaging that creates pressure to always be available.
- Deliberately sabotaging or impeding work performance.
- Persistent inappropriate criticism of any nature and personal abuse and/or ridicule, either in public or private, which humiliates or demeans those involved.

Managers are expected to give feedback, set expectations and manage performance. Constructive feedback, reasonable instructions or fair performance management do not amount to bullying when they are delivered respectfully, proportionately and in good faith.

## What to do if something does not feel right

### Informal approach

If you feel safe and comfortable doing so, you may choose to tell the person that their behaviour is unwelcome and ask them to stop. This is your choice. You do not have to deal with the situation alone, and you do not have to speak to the person directly before seeking support or making a report.

Where possible, make a brief note of what happened, when and where it happened, who was involved, who may have witnessed it, and any messages, screenshots or other information that may help. Do not put yourself at risk gathering evidence.

You can speak to your manager, another trusted manager, HR, Compliance Legal or another appropriate reporting channel. If the concern involves your manager, or you do not feel comfortable using your usual route, you can use another route. You can also ask for a confidential conversation to understand your options before deciding what to do next.

You are encouraged to raise concerns as early as you feel able, so support can be provided and further harm can be prevented. We also recognize that people may need time to process what has happened. A delay in speaking up does not mean your concern will not be taken seriously.

Temenos will treat concerns sensitively and share information only where there is a legitimate need to know, such as to provide support, assess risk, investigate fairly, comply with legal obligations or take appropriate action. Raising a concern in good faith, supporting someone else or participating in an investigation must not lead to retaliation.

### Formal procedure

When a team member feels that they need to deal with an issue of harassment or bullying formally, they should do so according to the Company's grievance procedure via HR. Formal grievances should be sent to **"HRgrievance@temenos.com"**

Formal concerns will be assessed and, where appropriate, investigated in a timely, fair, confidential and sensitive way. The process will be handled by someone with appropriate experience and, where possible, no prior involvement in the matter. Temenos may put interim measures in place to protect those involved and maintain a safe working environment while the matter is being reviewed.

**What to expect:** you will normally hear from us to acknowledge your concern within 5 working days, and we will let you know roughly how long the review is expected to take. If timescales change, we will tell you why.

Once the review or investigation is complete, we will update the people involved separately, to the extent appropriate and permitted by law. Whether or not a concern is upheld, we will consider what support, or practical steps may be needed to maintain a safe and respectful working environment.

Where there is a local Grievance Procedure (or similar) for employee complaints in place, that procedure will take precedence over the procedures described in this Policy.

If for any reason complaints described here are directed to Anonymous Reporting at Temenos, they will be managed under this Policy document.

### Consequences of a breach of this policy

If this policy is breached, Temenos may take corrective action, management action or disciplinary action, up to and including dismissal. The action taken will depend on the seriousness of behaviour and the circumstances. Temenos may also take steps to prevent similar issues happening again, such as coaching, training, changes to working arrangements, restrictions on contact, third-party management or other risk controls.

Where it is found that an employee has been harassed by a third party, such as a customer, supplier or independent contractor, the Company will take such steps as are reasonably practicable to prevent any recurrence.

Concerns raised in good faith will be supported, even if they are not ultimately upheld. Knowingly making a false or malicious allegation may be treated as a disciplinary matter. This does not apply where someone raises a concern honestly, even if the available evidence does not confirm it.

### Protection and support for those involved

Anyone who raises concern, supports someone else, witnesses' behaviour, participates in an investigation or challenges inappropriate conduct must be protected from retaliation. Support may include confidential advice, well-being support, adjustments to working arrangements, signposting to local resources or other practical measures appropriate to the situation.

### Record-keeping

We may place information about a complaint on your personnel file, along with a record of the outcome and any other notes or documents from the process. We handle this in accordance with our Data Protection policy.

### How we prevent and respond to bullying, harassment and retaliation

Everyone helps shape a respectful and psychologically safe workplace. We prevent and respond to bullying, harassment, sexual harassment and retaliation by:

- treating colleagues with dignity and respect;
- being thoughtful about the impact of our words, tone, messages, decisions and behaviour;
- listening and responding constructively if someone says our behaviour is unwelcome;
- speaking up, checking in or seeking help when behaviour may be inappropriate, unsafe or exclusionary;
- intervening safely where possible, or reporting concerns through a manager, HR, Compliance, Legal or another appropriate channel;
- being open, honest and objective in any review or investigation;
- completing required training and acting where feedback, surveys, exit interviews or other information show patterns or risks.

### Managers have a particular responsibility to:

- Set a good example by their own behaviour;
- Create psychological safety by making it clear that concerns can be raised early, without blame, dismissal or retaliation;
- Set clear expectations for respectful behaviour, address early warning signs and make sure people know where to get help;
- Respond to concerns with empathy, neutrality and practical support, rather than judging, minimizing or trying to resolve matters informally without proper consideration;
- Create space in team discussions for people to ask questions, raise risks or challenge decisions respectfully, especially where junior colleagues or quieter voices may otherwise be overlooked;
- Communicate to team members what standards of behaviour are expected from them;
- Intervene to stop bullying or harassment;
- Report promptly to HR or senior management any complaint of bullying or harassment
- Consider and manage foreseeable risks, including work-related social events, business travel, remote or online interactions, power imbalances and interactions with customers, clients, suppliers or other third parties.