

Non-Retaliation Policy

Worldwide Legal Policy

Doc Ref: Version 1.5
Date: October 01 2021
Contact: dpo@esspl.co.uk
Dept: Legal
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1.0 PURPOSE

As stated in our Code of Conduct, Elegant Systems is committed to the “highest standards of legal and ethical conduct” and all associates are responsible for immediately reporting any issue of legal or ethical non-compliance that they encounter and disclose any potential conflict of interest. Associates are encouraged not to hide problems, hoping that they might not be discovered, but instead bring them immediately into the light of day. This obligation is known as the “Sunshine Rule”. The purpose of this Policy is to protect from retaliation any associate who follows the Sunshine Rule and, in good faith, reports any issue of legal or ethical non-compliance or discloses any potential conflict of interest.

2.0 APPLICABILITY

This Policy applies to all Elegant Systems operations worldwide.

3.0 POLICY

- 3.1 Associates who, in good faith, report a suspected legal or ethical compliance violation or conflict of interest whether or not such suspicion turns out to be valid will not be subject to retaliatory or disciplinary action or other adverse employment consequences.
- 3.2 Any associate who knowingly makes a false report concerning a legal or ethical compliance violation or conflict of interest will not be protected and may be subject to disciplinary action.

- 3.3 Nothing in this Policy shall be construed as excusing any associate from their own misconduct or protecting them from disciplinary action as a result of their self-reporting such misconduct. However, the fact that an associate self-reported their own wrongdoing shall be taken into consideration in determining the appropriate disciplinary action against the reporting associate.

4.0 PROCEDURES

- 4.1 As indicated in the Code of Conduct, associates should immediately contact their supervisor, the Human Resources Department or the Legal Department if they suspect a legal or ethical compliance violation or potential conflict of interest.
- 4.2 Associates who prefer anonymity in reporting suspected violations or potential conflict of interest are encouraged to contact the Elegant Systems Hotline.
- 4.3 Any associate who reasonably believes that they have been subject to retaliation due to their disclosure of a legal or ethical compliance violation or potential conflict of interest, shall immediately inform the General Counsel, the Chief Compliance Officer, or alternatively the Executive Vice President of Human Resources.

5.0 RESPONSIBILITIES

Every associate is responsible for ensuring adherence to this Policy.

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6.0 DISCIPLINE

Any associate found to have violated this Policy will be subject to disciplinary action up to and including dismissal.

7.0 RELATED DOCUMENTS

- 7.1 Elegant Systems Code of Conduct
- 7.2 Hotline Reporting Policy

8.0 REVISION HISTORY

This is Version 1.5 of the Policy. Version 1.0 was issued on September 26, 2008 and last version 1.4 was issued on October 12, 2018.

9.0 APPROVAL

Date: October 01, 2021
Approval:

On File

ESSPL, Chief Executive Officer