

TouchNetix

WHISTLEBLOWING POLICY

APRIL 2024



Introduction

At TouchNetix, we are committed to upholding the highest standards of honesty, integrity, ethics, and accountability in all aspects of our business operations.

As part of our dedication to maintaining a transparent and responsible corporate culture, we have established clear and secure whistleblowing procedures. Employees, vendors, customers, and other stakeholders can report concerns about suspected unethical behavior, violations of laws or regulations, or any other wrongdoing within our organisation.

Each country prescribes what will be protected by whistleblowing legislation. The areas covered include, but are not limited to:

1. Failing to comply with or breaching laws and regulations
2. Committing a criminal offence
3. Endangering the health and safety of an individual
4. Corruption or other financial crime
5. Breach of personal data security

This mechanism should not be used to report any HR grievances or to settle any personal disputes.

Reporting

Individuals who become aware of any potential violation or wrongdoing are encouraged to report their concerns promptly. Reports can be made anonymously or openly, and they should be submitted to the appropriate designated channels:

1. A reporting system is available at [MyVoice](#).
2. Human Resources Department (Julie.Sleeman@touchnetix.com)
3. Chief Financial Officer (Birgitte.Bremnes@touchnetix.com)
4. Chairman (if the concern is about the CEO)
(finn.folling@gmail.com)

The company's headquarters in Trondheim can also receive written evidence.

TouchNetix
Sluppenvegen 23
7037 Trondheim
Norway

A whistleblowing concern should include the following information:

- Name and contact number of the whistleblower if the whistleblower does not wish to remain anonymous
- What has happened
- When it happened (e.g. time span, date, time)
- Who is involved
- Where it happened
- Whether there were any witnesses present
- Documents or evidence, if available

Following Report

Following the submission of a report, confirmation will be received via the online platform or the company's HR Manager. This individual will also be advised if the report meets the requirements to qualify as whistleblowing and the legal framework of the Country to which the concern relates.

This naturally will not apply if the report has been made anonymously.

The CEO will be informed of any report, unless it relates to the CEO.

Investigation

All reports of suspected wrongdoing will be promptly and thoroughly investigated by the appropriate person within the company. Investigations will be conducted with fairness, impartiality, and confidentiality to the greatest extent possible, consistent with legal and regulatory requirements. The investigation will be completed within a reasonable timeframe.

Upon completion of the investigation, appropriate remedial actions will be taken based on the findings. This may include disciplinary action, corrective measures, or changes to policies and procedures to prevent future occurrences.

Confidentiality

TouchNetix recognises the importance of protecting the confidentiality of whistleblowers to the greatest extent possible. All information will be held on a strictly need to know basis.

Anonymity cannot be guaranteed in all cases, especially if TouchNetix is legally obligated to disclose information related to the complaint.

Protection against detrimental treatment

TouchNetix prohibits retaliation against any individual who reports a concern in good faith. Any form of detrimental treatment against a whistleblower will not be tolerated and anyone found to have acted in such a manner will be subject to disciplinary action.

Recording

TouchNetix will maintain a written record of all activities, reports and information received as part of a report.

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