

ALERT PROCEDURE

2022

orolia 2022 Alert Procedure User Guide

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USER GUIDE

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1. What is the Alert Procedure?

The Alert Procedure is a part of Orolia's Code of Ethics which allows employees to report any illegal or unethical behavior by other employees or third parties. The procedure also guides employees on how to report any violations of Orolia's rules and policies.

2. Scope: What falls under the Ethics Alert Procedure?

The alert procedure applies when an employee reasonably believes one of the following has happened, is happening, or is likely to happen:

- A criminal offense, including fraud
- Disregard for the law, or any legislation
- Malpractice or ill treatment of an employee, customer or supplier
- Any disregard of Orolia's Code of Ethics or rules and policies, including conflict of interest, bribery, disclosure of confidential information, etc)
- Safety violation or safety hazard identified
- Any other serious irregularity
- Deliberate concealment of any of the above

The alert procedure is to be used in compliance with Orolia's policies, applicable laws and rules in the country in which the employee lives or works.

It should not be used to raise malicious or unfounded allegations: only those who use this policy in good faith will be protected under it.

3. How to raise an alert

Any concerns should be reported first to line management. However, if the employee believes that informing his/her line manager could present difficulties, or that such concerns may not be followed up appropriately, the following persons or committees can be contacted directly (in the order shown):

- Orolia Compliance Officer
- The local HR representative
- Orolia CHRO
- Orolia CEO

Concerns may also be reported to ethics@orolia.com. This mailbox is checked by Orolia's Compliance Officer.

ALERTS ARE NOT ANONYMOUS

However, the identity of the employee having raised the alert may be kept confidential to the Compliance Officer and, if applicable, to the person listed above who first received the alert.

4. WHAT HAPPENDS AFTER AN ALERT IS RAISED

The Compliance Officer receives each ethics alert, and examines it personally. The Compliance Officer is responsible for following up on the alert per the Alert Procedure, including any needed investigation. If the Compliance Officer deems it necessary, an interview will be arranged with the employee who raised the alert. Confidentiality is maintained to the greatest possible degree, but is not guaranteed. Alerts may be communicated to members of the Orolia team who have knowledge relevant to the subject. All alerts are examined in accordance with the rules applicable to the handling of personal data.

If the alert concerns the Compliance Officer, Orolia's CEO will take the responsibilities of the Compliance Officer.

5. CONSEQUENCES OF THE ALERT

Disciplinary action will not be taken without an investigation. The employee who raised the alert may request to be informed of the outcome of the investigation. If the investigation determines that unethical conduct has occurred, that determination is forwarded to the Compliance Officer and to Orolia's VO of HR who will initiate disciplinary

action as and if relevant. Orolia may be required by law to report certain illegal activities to the proper enforcement agencies. ORE

6. NO RETALIATION

Any retaliation in any way against an employee for raising or participating in the investigation of any alert is absolutely prohibited. Orolia shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee with respect to a good faith alert or participation in a related investigation. Any employee who engages in retaliation is subject to disciplinary action up to and including termination. Should an employee believe that he/she is the subject of such retaliation, the employee should report the retaliation to the Orolia Compliance Officer, the local HR representative, Orolia VP of HR, or Orolia CEO.

7. VIOLATIONS

Any employee who violates the Alert Procedure may be subject to disciplinary action up to and including termination.

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