



# Speak Up Policy

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## 1. Introduction

### 1.1 Purpose

The purpose of the Speak Up Policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of retaliation. Further guidance on the process steps can be found in the Bridge Carbon Voices Guidelines.

### 1.2 Scope and Applicability

The scope of this document is global. It applies to employees of all Bridge Carbon group companies and subsidiaries, together with all individuals, agents, contractors, interns and temporary personnel who work with or provide services to Bridge Carbon Group companies and subsidiaries.

In addition, this policy applies to individuals from third parties and business partners that Bridge Carbon engages.

## 2. Policy

### 2.1 Why you should Speak Up?

Speaking up is an essential act that enables us to protect our people, our company, and our stakeholders, and helps promote a better society.

Bridge Carbon can only address issues, concerns, and instances of misconduct if we know about them. A transparent speak up culture enables us to identify issues and concerns and enables us to uphold our commitment to adhere to the highest business and ethical standards.

## **2.2 Anonymity**

You can choose to remain anonymous when using Bridge Carbon Voices unless you are in a jurisdiction in which anonymized reports are not legally allowed. The online and mobile access will confirm for you what your jurisdiction allows.

Please note that the Compliance Team is responsible for anonymizing any information that comes in to protect your identity. The Bridge Carbon Voices channel also makes safe dialogue possible anonymously.

## **2.3 How to Speak Up**

There are various channels you may use to raise a concern. While we always encourage to address the issue directly with the person involved, there may be reasons you do not want to do this. Speak Up reports can be made in whichever way you feel most comfortable. Further guidance on the process steps can be found in the Bridge Carbon Voices Guidelines.

The Bridge Carbon Voices channel at <https://voices.integrityline.com> is operated via an independent service provider. You can make a report to the Bridge Carbon Voices channel online or via phone. When making a report through the Bridge Carbon Voices channel, you can decide if you would like to remain anonymous.

You will receive final feedback on your report within 90 days after the acknowledgement of receipt. Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy, and the legal rights of the involved parties. All parties involved, including the accused, are entitled to confidentiality.

At all times you are also able to log a report externally. Click [here](#) for a link to the Public Interest Disclosure Act.

## **2.4 Protection**

Protecting your right to speak up is essential and one of the key functions of this policy is to protect individuals who report questionable behavior or actions.

In turn, a person who is subject of a concern also needs protection. Bridge Carbon presumes innocence as a key: the presumption of innocence is a leading principle. The Compliance Team is responsible for protecting the rights of anyone who is accused – or otherwise involved – in any issue.

## **2.5 Safeguarding your Privacy**

Bridge Carbon is committed to protecting the privacy of everyone involved in the Speak Up process. We will act within reason to safeguard personal data from unauthorised access and processing. Any personal data obtained will be processed in line with our privacy policies and will only be used for the purposes explained in this policy or to comply with the law. Further guidance can be found in the Bridge Carbon Data Privacy policy.

### **3. Non-Retaliation**

#### **3.1 Prohibition Against Retaliation**

A person who speaks up under this policy is protected from retaliation. The right to non-retaliation is stated in our Code of Business Conduct. Bridge Carbon will not tolerate any instances of retaliation. Any form of retaliation against those speaking up may lead to disciplinary measures. If you notice or experience any retaliation, please report the retaliation via one of our Bridge Carbon Voices channels along with any examples (e.g., emails, WhatsApp messages, etc) showing the retaliation.

Bridge Carbon guarantees confidentiality to the extent legally possible as well as addressing any retaliation against the reporter upon learning of said retaliation.

Bridge Carbon prohibits any form of retaliation against an employee who raises a concern in good faith about suspected or actual misconduct through any channel, or who cooperates in an investigation of misconduct. The Company also expects business partners to prohibit any form of retaliation as set out in the Scope and Applicability section of this document.

#### **3.2 What is Retaliation**

Retaliation is any form of negative consequence, penalty and/or abuse given out to an employee for:

- Raising a genuine concern of suspected or actual misconduct through any channel.
- Their cooperation in an investigation of misconduct.

Retaliation may take place against various people depending on the context - not only against employees accessing or interacting with the Bridge Carbon Voices mechanism – but also against other persons, such as the reporter’s family members, friends, or colleagues.

- Physical: all forms of harassment including sexual harassment; physical abuse or violence; and surveillance.
- Psychological: Verbal intimidation or threats; inappropriate, discriminatory, or disparaging comments; and bullying.
- Economic: Demotion; less favourable assignments than the employee would have otherwise received; lower performance ratings; disciplinary action; termination; salary reduction; preventing promotion; and job reassignment.

#### **3.3 Reporting Incidences of Retaliation**

If an employee believes that he or she has been subject to retaliation for participating in the Speak Up process or has witnessed or is aware of retaliation against another employee, it can be reported to any member of senior management. In addition, you can report directly to the Bridge Carbon Voices Channel if you do not feel comfortable doing so or would like to report anonymously.

Reports of alleged retaliation can be made anonymously – unless prohibited by law in specific jurisdictions - however anonymity may limit the ability to investigate a claim fully and thoroughly. If an incident is reported anonymously, the Company encourages the reporter to provide sufficient information so that the matter can be investigated.

### **3.4 How we manage Reports of Retaliation**

Reports of alleged retaliation are assessed and investigated using the process set out in Bridge Carbon Voices Guidelines and the internal Bridge Carbon Investigations Protocol. The Reports are then further managed by the Legal & the Ethics & Compliance Team with the support of HR and where appropriate external counsel.

## **4. Related information about this Policy**

### **4.1 Board Oversight**

The Bridge Carbon Board shall receive an anonymized management summary of cases reported and resolutions once every 6 months. However, cases that could result in security or safety risk or material fraud shall be immediately escalated to the Board.

### **4.2 Implementation**

This policy will be implemented through the following:

- Publication to all Bridge Carbon employees, contractors, and engaged volunteers.
- Publication externally to all 3rd parties and reference inclusion in the Bridge Carbon Supplier Code of Conduct.
- Publication on the Bridge Carbon website and access to the Bridge Carbon Voices channel made available on the website.
- Publication on the Bridge Carbon Intranet and access to the Bridge Carbon Voices channel on SharePoint.
- Inclusion of this policy in annual compliance training provided internally to employees, contractors and engaged volunteers of Bridge Carbon Group companies and their subsidiaries.

### **4.3 Abuse of this Policy**

The Bridge Carbon Speak Up Policy only applies to reports made in 'good faith' relating to misconduct, potential misconduct, and violation of our Code of Conduct and supporting policies.

We take the practice of reporting in bad faith (e.g., false or unfounded accusations) or any other form of misuse of this policy seriously. Such acts are a breach of the Code of Business Conduct. Employees who abuse the Speak Up Policy will be subject to disciplinary actions up to and including termination of employment.