



Speak Up Policy

April 2024

Contents

- Introduction..... 2
- 1 Scope..... 3
- 2 Reporting Options..... 4
- 3 Assigning Responsibilities..... 4
- 4 Reporting in bad faith..... 5
- 5 Protection of the Reporter..... 5
- 6 Protection and rights of the accused.....5
- 7 Data Protection..... 6
- 8 Annex A – SpeakUp Communication tool reporting guide.....7

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Introduction

Kinly recognizes its responsibility to its customers, shareholders, suppliers, employees and society at large. We aim to conduct our business in a caring and accountable manner to achieve sustainable growth, taking responsibility for the social, environmental and economic impacts of our activities, whilst fulfilling moral and legal obligations.

Kinly encourages a free and open culture in dealings between our employees and all people with whom we engage in business. In the Kinly Code of Conduct the basic principles that we live and work by are set out. This policy is designed to provide guidance to all those who work with or within Kinly who may from time to time feel that they need to raise certain issues relating to Kinly in general or in relation to breaches of the Kinly Code of Conduct with someone in confidence. Employees, consultants or anyone working or associated with Kinly (together referred to as “Reporter”) are often the first to realize that there may be something of concern. Kinly recognizes that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with.

A Reporter who, in the public interest, raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

1 Scope

A Reporter can notify suspicions of illegal, fraudulent or unethical conduct within the company. The aim of this policy is to encourage Reporters who have serious concerns about any suspected misconduct within the company to come forward and voice those concerns.

'Speaking up' is viewed by Kinly as a positive act that can make a valuable contribution. We recognize that the decision to report a concern/complaint can be a difficult one to make. It is not disloyal to colleagues or the company to speak up. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

Examples of suspected misconduct are (this list is not exhaustive):

- a criminal offence has been committed, is being committed or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with the Kinly Code of Conduct, a Kinly policy or legal obligation to which the person is subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health and safety of any individual has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged;
- discrimination based on race, sex, disability or any other category;
- unauthorized use of public funds or other assets;
- possible fraud and corruption;
- other unethical conduct.

There is no need for a Reporter to prove that the breach or failure that they are alleging has occurred or is likely to occur. A reasonable suspicion will suffice, i.e. where the Reporter reasonably believes that the information disclosed is substantially true.

2 Reporting Options

You can raise suspected misconduct as follows:

1. With your line manager. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager's responsibility to help solve problems.
2. Seek help from another Kinly resource in a case where it may not be appropriate to raise the concern with your manager. In that case you can for example turn to your Managing Director, your HR manager, or the Legal department.
3. You can also raise a concern directly with the Compliance Committee by email: trust@kinly.com
4. If you don't feel comfortable raising your concern via the before mentioned channels and wish to remain **anonymous**, you can also raise a concern by making a notification via our SpeakUp Communication tool:
 - Web URL: <https://kinly.speakup.report/kinly>
 - QR CODE:



- Or via telephone by dialling one of the numbers as included in Annex A.

3 Assigning Responsibilities

All reports coming in through the SpeakUp communication tool will be made available to the Compliance Committee.

The Compliance Committee, upon receipt of reports of alleged misconduct or fraud, will evaluate and assess the information received, and determine the appropriate course of action. This will, in most cases, result in the responsibility for next steps being assigned to the most appropriate person. The Compliance Committee will ensure that all reported cases are investigated, documented appropriately, and submitted to the designated offices.

Kinly expects management at all levels to handle all matters concerning any misconduct seriously, confidential and promptly. Management is obliged to co-operate fully with and assist whoever is appointed to investigate the misconduct.

The Compliance Committee has the right not to investigate a concern. This can be the case when:

1. There is insufficient information for an adequate investigation and if there is no possibility of obtaining further information;
2. It is established that the report was made in bad faith.

Kinly will keep you informed of the developments of the investigation following your report, unless this is not allowed under applicable laws or otherwise not appropriate. Kinly shall where possible, inform you on the outcome and any recommendations regarding your report. If you used the SpeakUp communication tool to raise your concern, we will inform you via this tool accordingly.

4 Reporting in bad faith

Kinly takes the practice of reporting in bad faith very seriously. Reporting in bad faith means reporting something which you know isn't true and/or is done with the sole intention to harm others. This act is considered to be a serious breach of the Code of Conduct and disciplinary action will be taken against employees reporting in bad faith. A concern made in good faith, but which cannot be proven, is not reporting in bad faith.

5 Protection of the Reporter

Kinly will not tolerate any harassment or victimization of a Reporter (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. Kinly has a strict policy of non-retaliation against Reporters under this SpeakUp Policy.

All concerns will be treated in confidence as far as possible. If disciplinary or other proceedings follow the investigation, it is likely that an investigation will be necessary and the Reporter who has made the disclosure may be required to attend an investigatory meeting and/or a disciplinary meeting (as a witness). Although you may feel uncomfortable, you will be offered advice and support. Appropriate steps will be taken to ensure that your working relationships is not prejudiced by the facts of the disclosure.

The right of non-retaliation is guaranteed under this SpeakUp Policy and violation of this right will not be tolerated. Becoming a Reporter does not, however, automatically result in immunity for misconduct.

If a Reporter raises a concern anonymously via the SpeakUp Communication tool, the identity of a Reporter will be protected. The third party that hosts the SpeakUp Communication tool will never disclose voice-files, IP addresses or phone numbers, unless the two exceptions explained in the next paragraph apply. If you made a report via the anonymous SpeakUp Communication Tool we could ask you to make yourself known for the purposes of attending an investigatory meeting and/or disciplinary meeting. You are however under no obligation to make yourself known if you wish to remain anonymous.

Even when the procedure has been followed correctly, there are two exceptions when a Reporter's protection cannot be guaranteed. In these matters, the authorities might be involved. Voice file, IP addresses and phone numbers might be handed over to the authorities, but never to Kinly. This can only be done in the following cases:

- (1) In cases where it is established that a report has been made in bad faith;
- (2) If the report itself is a criminal offence [e.g. a serious threat];

If the Reporter is not satisfied with the follow-up and/ or outcome of his/her report or when he/she doesn't feel protected, he/she can file a complaint directly at the Compliance Committee (trust@kinly.com) or through the SpeakUp communication tool. If the reporter is not satisfied with the decision of the Compliance Committee, parties will seek an independent external advisor to advise in this matter.

6 Protection and rights of the accused

When a person is officially under investigation, then this person needs to be notified about this fact, unless laws or regulations prohibit this. Kinly will notify the person under investigation as soon as possible, with a maximum of seven days. This period can be extended if there is a substantial risk of destruction of evidence and/or impediment to the investigation.

The subject has the right to appeal against the investigation. A subject under investigation can turn to the Compliance Committee for rectification and appeal.

This person can do this by following the next steps: send an email to trust@kinly.com. If the accused is of the meaning that his/her appeal is not being solved to its satisfaction, the Compliance Committee shall seek an independent external advisor to advise in this matter.

7 Data protection

When the Reporter makes a disclosure, Kinly will process any personal data collected in accordance with the laws and regulations on data protection. Personal data collected from the point at which the Reporter or individual makes the report is held securely and accessed by and disclosed to individuals only for the purposes of dealing with the disclosure.

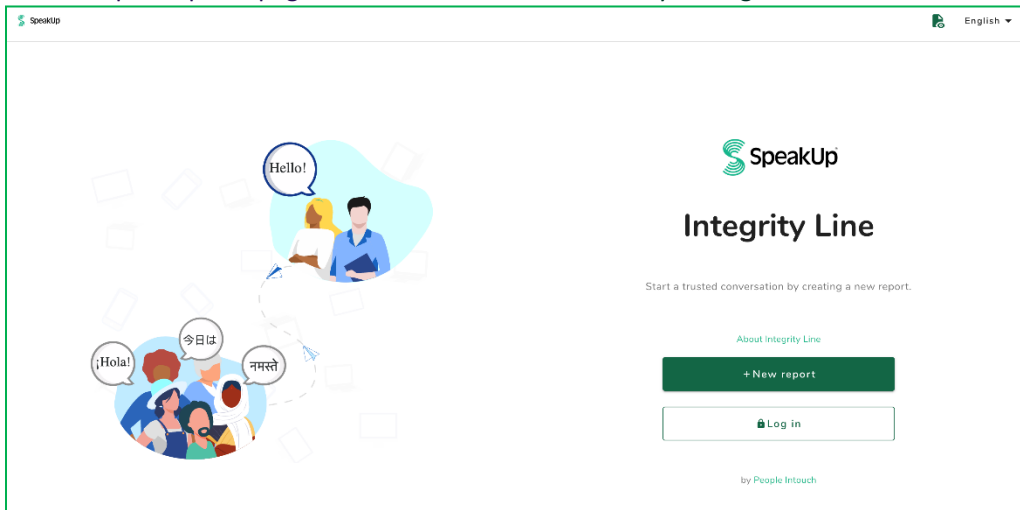
ANNEX A

SpeakUp reporting guide

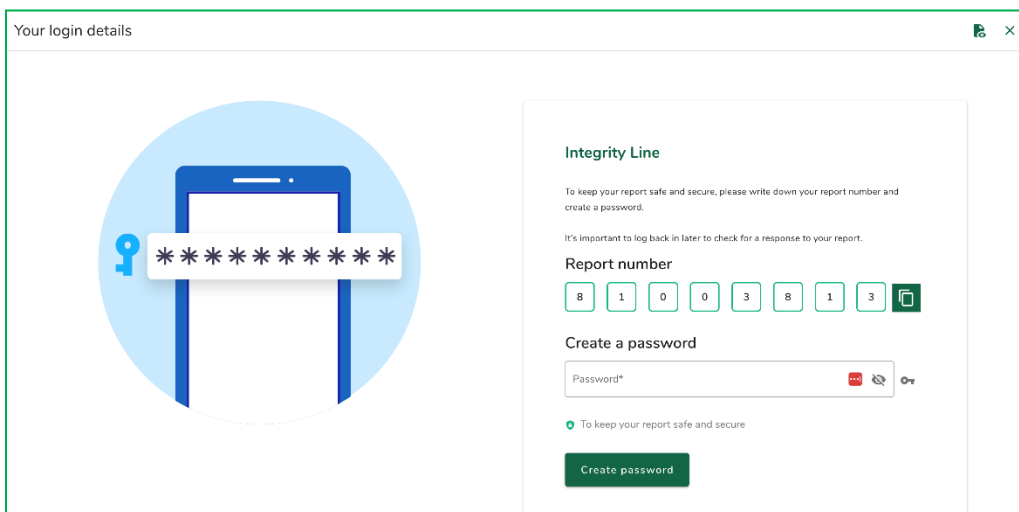
How to leave a report via the SpeakUp Communication tool

Via Web

1. Visit the SpeakUp webpage with the URL and/or QR code your organisation has communicated.

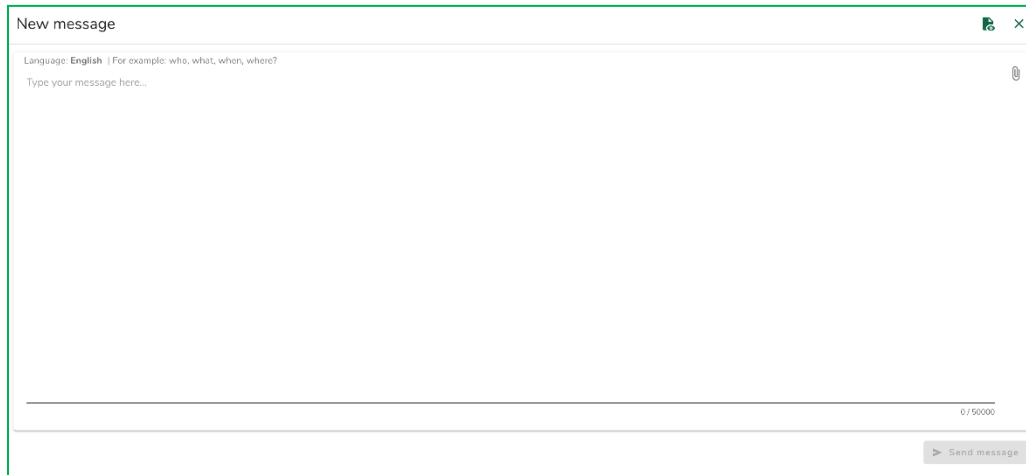


2. Click on '+ New report' to start a trusted conversation.
In case you already have an open report, select 'Log in'.
3. Select the language in which you want to leave your message.
4. Note down your unique 'Report number' and create a password for your report.
You will need these to check back for a response later.



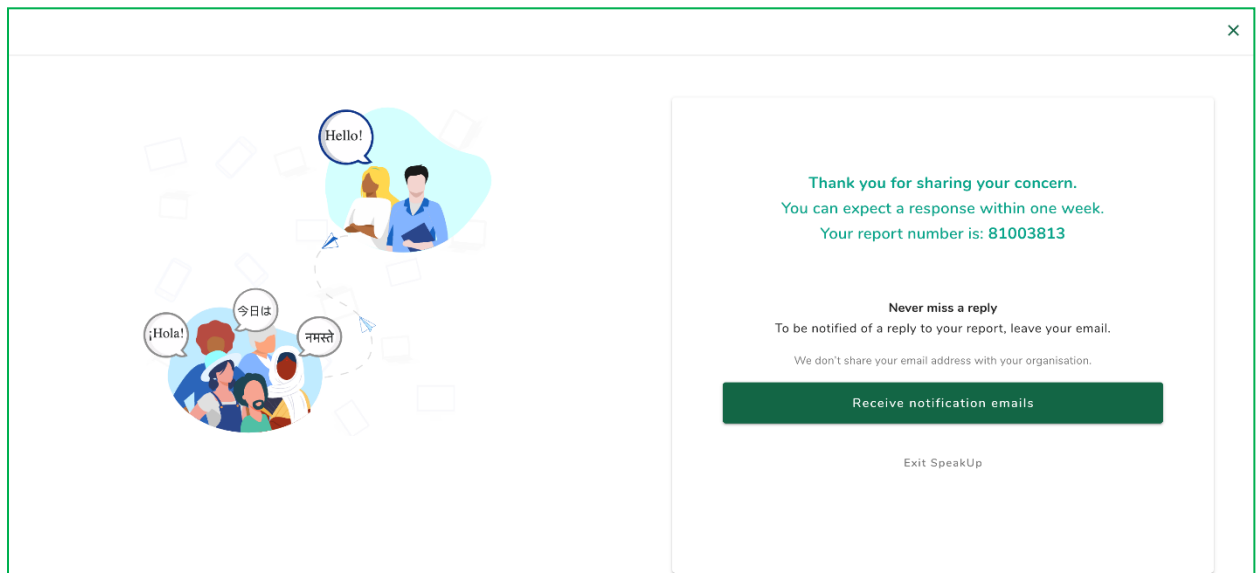
5. Type your message.

You can upload attachments via the clip icon found in the top-right corner.



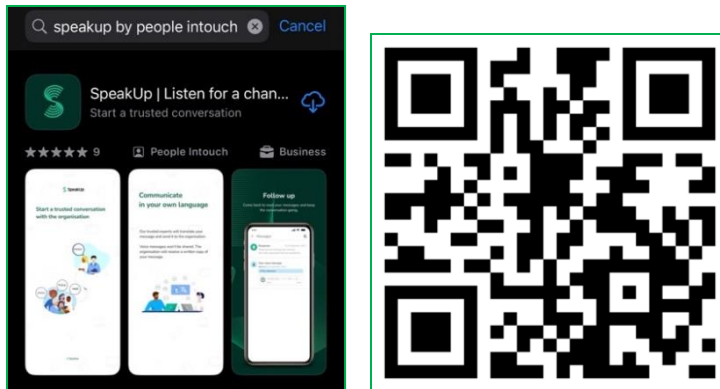
6. Click 'Send message' and your message and attached files will be processed.

7. You have the option to leave your email if you'd like to be notified when there is a response. After adding your email, you'll be asked to type the verifying code sent to the provided email address.

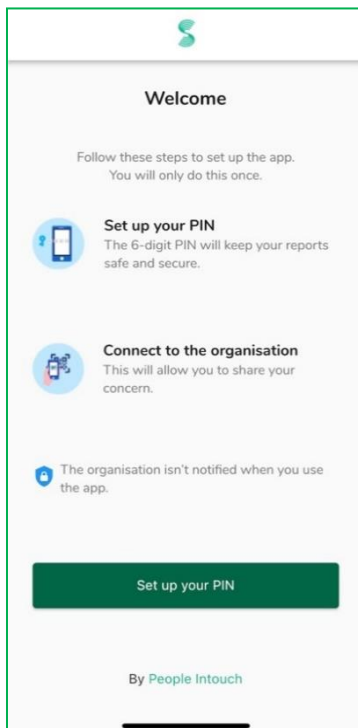


Via the SpeakUp App

1. Download the 'SpeakUp by People Intouch' app from the App Store/Google Play or scan the QR code.



2. Open the App



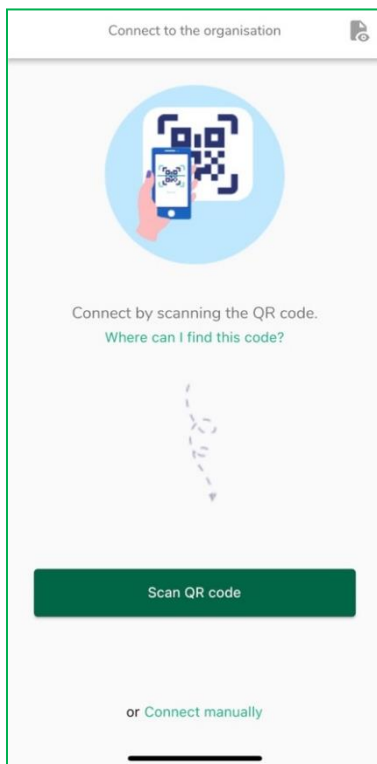
3. Click on 'Set up your PIN' and enter a 6 digit code.

→ You will need to enter this PIN each time you open the App.

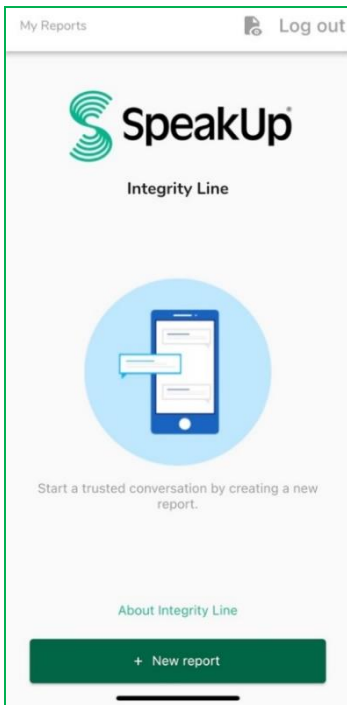
→ If you forget your PIN, you need to re-install the App and set up a new one. If so, you will lose access to your ongoing open reports.

4. The App will ask you to connect to your organisation by scanning the QR code. Alternatively, you can enter the organisation code by clicking on the 'Connect Manually' button on the bottom of the page.

→ The QR and/or the organisation code has been communicated to you by the organisation.

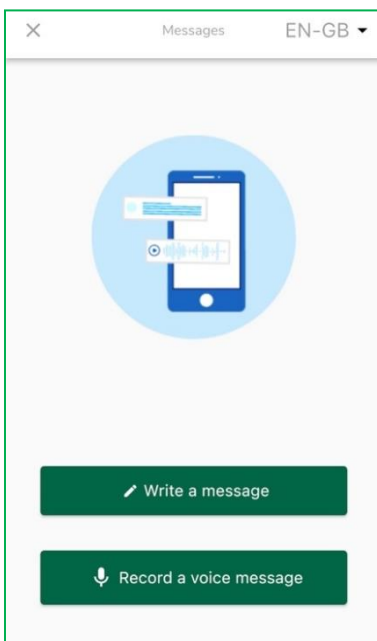


5. Press the '+ New report' button to start a trusted conversation.

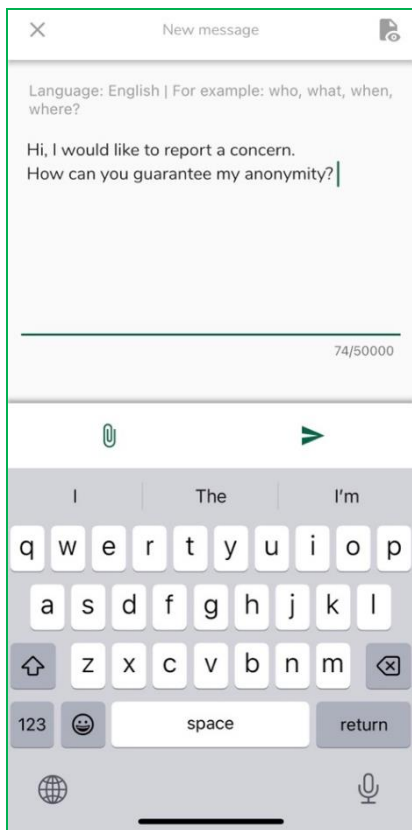


6. You can leave your message by clicking the relevant button.

→ If the organisation has enabled it, you can leave a voice recording via the app. (Your voice will never be heard by the organisation. They will only receive a transcript of your voice recording.)

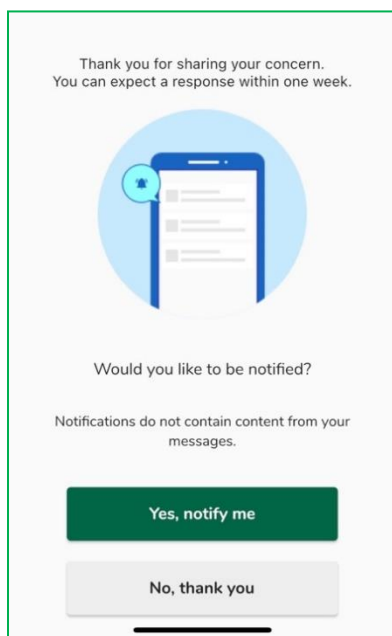


7. After typing your message, press the arrow icon to send it. You may attach files (up to 25 items) by clicking on the paper click icon.



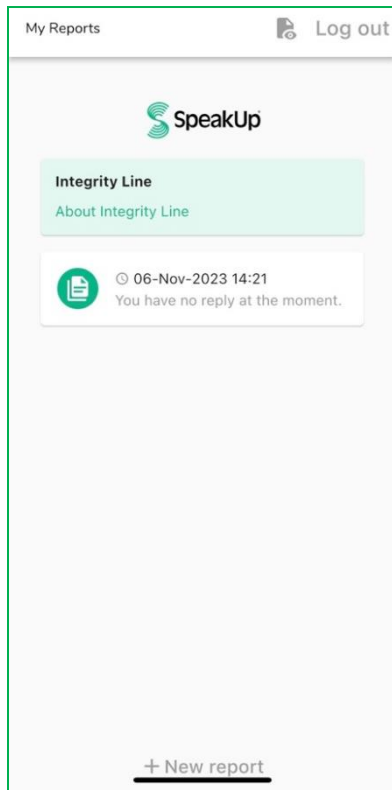
8. After sending your message you can expect a reply within one week.

→ You can opt to be notified by the app of any responses.



9. When you log back in you will see if there are any new responses from the organisation.

→ If you have a different concern to report, you can do so by clicking '+New report'.



Via Phone

1. Below you will find a list of SpeakUp phone numbers relevant for the Kinly locations.
2. Dial the phone number for the country that you are located in.
3. The voice prompts will guide you through the following steps:
 - I. Enter the 'Organisation code' of Kinly: 115236
 - II. Select your language
 - III. You will receive a unique 'Report number'
 - Write this down carefully as you will need it to be able to call back and hear a response to your report.
 - IV. Choose a 4 digit PIN code
 - Remember it so that you can log back in later
 - V. After the tone simply speak your message
 - VI. Once done, press 1 or simply hang-up
 - VII. You can expect a response within one week. Make sure to call back with your Report number and PIN to check for a response.

SpeakUp Phone numbers

Country	Phone Number and any additional notes
Germany	Freephone: 0800 1818 952
Hong Kong	Number: +852 3019 4193 Call charged at local rate
India	Freephone: 0008 0005 03159
Ireland	Freephone: 1800 800 636
Netherlands	Number: +31 10 700 75 03 Call charged at local rate
Norway	Number: +47 24 14 06 01 Call charged at local rate
Singapore	Number: +65 6403 7051 Call charged at local rate
Switzerland	Freephone: 080 000 5691
United Kingdom	Freephone: 080 0022 4118
United States of America	Number: +1 (669) 288 7154 Call charged at local rate



Working together. Everywhere

Why Kinly?

Bringing people & technology together for better productivity wherever the work happens – because great things happen when people work together

01 EXPERIENCED

Dedicated expertise in planning, supplying, integrating and managing market-leading visual collaboration services.

02 PROVEN

Globally recognised businesses relying on us for secure and flexible meeting and collaboration services.

03 INDEPENDENT

A leading partner with the world's top vendors to deliver the best choice of solutions for public and private sector businesses.

04 SCALE

An end-to-end provider of workspace transformation services with worldwide presence.