



AxiomSL Whistleblowing Policy

1. ABOUT THIS POLICY

- 1.1. The AxiomSL group of companies are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. We believe that doing so is one of the many things that make AxiomSL a great Company. To that end, every one of us is evaluated, in part, based on our compliance with the laws and other rules that apply to our business, and based on making sure that our colleagues are acting in compliance as well. Therefore, any suspected wrongdoing should be reported as soon as possible.
- 1.2. This policy covers all employees, officers, consultants, contractors, volunteers, interns, part-time workers and agency workers.
- 1.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.4. All employees are **required** to report any suspected potential violation of law involving AxiomSL and any retaliation against anyone involved in making such a report, including persons who assist in making the report or who participate in a subsequent investigation. A good faith report of a suspected violation of law is protected under this policy, even if the facts turn out not to support a conclusion of a violation of law.

2. WHAT IS WHISTLEBLOWING?

- 2.1. Whistleblowing is the reporting of an activity that a person thinks to be illegal, dishonest, unethical or otherwise improper. This includes bribery and corruption, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

3. HOW TO RAISE A CONCERN

- 3.1. We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Whistleblowing Officer in your region. Contact details are at the end of this policy.
- 3.2. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 3.3. If you are a manager and you receive a whistleblowing report from one of your subordinates, you should contact the Whistleblowing Officer for your region as soon as possible. That officer will work with you on the appropriate next steps, including an appropriate investigation undertaken by the Whistleblower Officer under the auspices of our Audit Committee.

4. CONFIDENTIALITY

4.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. EXTERNAL DISCLOSURES

5.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

5.2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

6.1. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.2. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately.

6.3. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

6.4. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

6.5. A whistleblower will further be protected if he or she discloses our trade secrets in two circumstances: (1) to a federal, state, or local government for the purpose of reporting a suspected violation of the law; or (2) in filing a lawsuit for retaliation for reporting a suspected violation of law, provided that the document containing the trade secret is filed under seal.

7. CONTACTS

A whistleblower may contact the Whistleblowing Officers named below or file a report using our third-party hotline service.

To file a report online, please go to one of the following websites:

Language Name	Direct URL
English	www.lighthousegoto.com/axiomsl/eng
German	www.lighthousegoto.com/axiomsl/ger
Polish	www.lighthousegoto.com/axiomsl/pol
Portuguese	www.lighthousegoto.com/axiomsl/por
Hebrew	www.lighthousegoto.com/axiomsl/heb
Japanese	www.lighthousegoto.com/axiomsl/jpn
Russian	www.lighthousegoto.com/axiomsl/rus
Spanish	www.lighthousegoto.com/axiomsl/spa
Ukrainian	www.lighthousegoto.com/axiomsl/ukr

We strongly recommend that reports are filed online, particularly if the report is filed in a language other than English.

To file a report by phone, please use one of the following telephone numbers:

Toll-Free Telephone:

Direct Dial

- English speaking USA and Canada: **833-430-0001**
- Spanish speaking USA and Canada: **800-216-1288**
- French speaking Canada: **855-725-0002**
- Spanish speaking Mexico: **01-800-681-5340**

AT&T USADirect

- All other countries: **800-603-2869** (must dial country access code first [click here](#) for access codes and dialing instructions)

To file a report by email, please send an email to: reports@lighthouse-services.com (you must include the company name with report)

To file a report by fax, please send a fax to + 1 (215) 689-3885 (you must include the company name with report)

The designated Whistleblowing Officers are:

Whistleblowing Officer	Erik Akopiantz Email: eakopiantz@op.thomabravo.com
Whistleblowing Officer	Joshua Geller Tel.: +1 212-248-4188, ext. 119 or + 1 917-371-3787 Email: jgeller@axiomsl.com
Whistleblowing Officer	David Weber Tel.: + 1 212-248-4188, ext. 116 Email: dweber@axiomsl.com
Alternative Whistleblowing Officer	Praveen Venugopal Tel.: + 1 212-248-4188, ext. 107 E-mail: pvenugopal@axiomsl.com