OCTAVE SPEAK UP POLICY

1. PURPOSE

The Company operates internal reporting and investigation mechanisms in line with applicable legal requirements, including laws governing whistleblower protection and internal investigations.

This Speak Up Policy ("Policy") establishes the principles and governance framework for receiving, assessing, and handling reports of potential misconduct. It is designed to support the identification, escalation, and appropriate handling of concerns and to contribute to the Company's Ethics & Compliance System by informing risk management, control improvements, and preventive measures.

This Policy sets expectations for how reports are handled. Detailed processes, timelines, and operational requirements are addressed in supporting procedures and guidance.

2. APPLICABILITY

This Policy applies to all directors, officers, employees, and third parties acting on the Company's behalf (collectively referred to as "Personnel"), whereby "Company" is defined as Octave Intelligence plc, its subsidiaries, and joint ventures where it exercises management control.

This Policy also extends to any individual who, in a work-related context, reports suspected misconduct involving the Company's operations, Personnel, or business partners, regardless of their formal association with the Company.

Individuals who raise concerns are referred to in this Policy as "Reporter(s)."

3. SCOPE

This Policy applies to the receipt and handling of reports submitted through the Company's internal reporting channels. It defines the protections available to Reporters and establishes the principles for assessing and triaging reports and for conducting internal investigations.

4. COMMITMENTS

The Company manages internal reporting and investigation processes on a risk-based basis and in line with applicable legal requirements. In particular, the Company commits to the following:

4.1 Maintain reasonable and appropriate reporting channels that are accessible, secure, and, where legally permitted, allow for anonymous reporting.

4.2 Handle reports confidentially, in accordance with applicable law and the Company's established procedures.

4.3 Perform an initial assessment of reports to determine, based on materiality, subject matter, and applicable legal requirements, whether follow-up or an internal investigation by the Compliance function is appropriate, or whether the matter should be addressed through another suitable process.

4.4 Provide feedback to Reporters within the timeframes required by applicable law, where such feedback is legally permissible and appropriate.

4.5 Conduct internal investigations in a manner designed to be independent, objective, and proportionate, taking into account due-process considerations and the presumption of innocence.

4.6 Take appropriate steps, in accordance with applicable law, to protect individuals who raise concerns in good faith from retaliation.

4.7 Maintain appropriate records relating to reports and related actions, consistent with applicable confidentiality, data-protection, and record-retention requirements.

4.8 Prohibit interference with reporting or investigation processes, including the unauthorized destruction, alteration, or concealment of relevant information.
4.9 Promote awareness of the Company's Speak Up framework and periodically review its effectiveness.
4.10 Provide appropriate training to Personnel who may receive or handle reports, with a focus on confidentiality, non-retaliation, and proper escalation.
4.11 Respect individuals' statutory rights to report concerns to competent authorities and affirm that no Company policy, agreement, or confidentiality obligation shall be interpreted or applied in a manner that unlawfully restricts those rights.
4.12 Make available information on reporting channels, non-retaliation safeguards, and general guidance on what may be reported and what Reporters can expect after submitting a report.

5. STANDARDS OF CONDUCT

Personnel and, where applicable, Reporters must:

5.1 Raise concerns regarding actual or suspected violations of law, the Company's Code of Business Conduct and Ethics, or Company policies, as well as other conduct that may pose legal, regulatory, financial, or reputational risk to the Company, through the Company's established reporting channels. Additional guidance on what may be reported, and available reporting channels is provided here.
5.2 Make reports in good faith, meaning the Reporter reasonably believes the information provided is true and accurate, and refrain from knowingly submitting false, malicious, or frivolous allegations.
5.3 Cooperate with internal investigations, where reasonable, including by participating in interviews and preserving and providing relevant information, documents, and records.
5.4 Treat reports and related investigation information confidentially, subject to applicable law and legitimate needs for assessment, investigation, or response.
5.5 Not obstruct, interfere with, or improperly influence any reporting or investigation process, including by withholding information, destroying documents, or attempting to identify an anonymous Reporter.
5.6 Not engage in retaliation, directly or indirectly, against any Reporter who raises a concern in good faith or participates in an investigation and promptly report any suspected retaliation.
5.7 Support the Company's reporting framework by ensuring that concerns received outside official reporting channels are appropriately directed to the Compliance function.
5.8 Promptly escalate any external inquiries relating to alleged misconduct or legal violations (including from regulators, law-enforcement authorities, or the media) to the Compliance function.
5.9 Complete all mandatory training related to internal reporting and investigations.
5.10 Seek guidance from the Compliance function when uncertain about how to raise a concern or how this Policy applies.

6. GOVERNANCE AND RESPONSIBILITIES

This Policy forms part of the Company's Ethics & Compliance System and has been approved by the Audit Committee.

The Board of Directors, and any committee to which it has delegated oversight responsibility, oversee the effectiveness of this Policy. The Audit Committee oversees the receipt, retention, and treatment of reports concerning accounting, internal controls, or auditing matters in accordance with the requirements of the Sarbanes-Oxley Act. Reports concerning executive officers, as defined under applicable U.S. securities laws, will also be notified to the Chair of the Audit Committee.

The Chief Legal Officer is accountable for this Policy. The Compliance function supports its implementation by developing related procedures and guidance, providing advice, and supporting consistent application across the Company.

Management is responsible for integrating the requirements of this Policy into day-to-day business activities and for ensuring cooperation with the Compliance function. This includes taking reasonable and appropriate steps to assign responsibilities, allocate resources, and embed relevant compliance controls and workflows into business processes.

7. CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this Policy or applicable laws may result in disciplinary measures, up to and including termination of employment or contractual relationships, in accordance with applicable law.
Non-compliance may also expose individuals and the Company to civil or criminal liability and may result in the suspension or disengagement of business partners.

Management is expected to lead by example and to promote a culture of compliance. Failure to exercise appropriate supervision or to take reasonable steps to prevent or address violations may result in accountability measures.

8. REPORTING AND INVESTIGATION

Personnel are expected to promptly report any actual or suspected violations of this Policy or applicable laws. Reports may be made through the Company's established reporting channels.
Information on available reporting channels, confidentiality protections, and non-retaliation safeguards is available on the Company's website.

Reports are reviewed and investigated in accordance with this Policy and related procedures.

9. REVIEW

This Policy is reviewed periodically to reflect changes in applicable law, enforcement practice, and the Company's risk profile.
Material updates to this Policy are approved and communicated by the Chief Legal Officer.

10. CONTACT INFORMATION

Questions regarding this Policy may be directed to the Chief Legal Officer or the Compliance function.

Current contact details are available on the Compliance page of the Company's intranet. External inquiries may be submitted via the Company's website.