



# SPEAKUP LINE

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### WHAT YOU CAN REPORT

#### Q1. What can I report?

Use the SpeakUp Line to report suspected or potential violations of applicable law or regulation, the Code of Business Conduct and Ethics, Octave policies, or the Supplier Code of Conduct, involving Octave, its employees, suppliers, or business partners.

Examples include:

- accounting, auditing, financial reporting, internal controls, or potential securities law violations
- fraud, bribery or corruption, or conflicts of interest
- export controls or sanctions issues
- antitrust or competition law concerns
- money laundering or terrorist financing concerns
- corporate tax misconduct or tax evasion concerns
- public procurement irregularities
- privacy, data protection, or cybersecurity violations, except where specific procedures apply (e.g., privacy or security incident escalation), in which case they must be reported through the designated channels
- discrimination, harassment, or human rights concerns at Octave or in its supply chain
- health and safety risks
- product safety or conformity issues
- environmental violations or breaches
- retaliation against someone for raising a concern in good faith
- concerns you tried to raise through normal channels but that were not addressed
- repeated concerns about the same behaviour or the same individual over time

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#### Q2. What should I not report via the SpeakUp Line?

The SpeakUp Line is not the right channel for matters that are not misconduct concerns. For the following, please use HR, your line manager, or the relevant operational function:

- day to day disagreements, communication problems, or personality clashes
- workload, resourcing, scheduling, or performance management questions
- feedback disputes, performance reviews, promotions, or role changes
- team morale or culture issues without an allegation of misconduct
- requests for mediation, coaching, or manager support
- operational matters such as sales, pricing, discounts, customer support, or after-sales issues that do not qualify as a reportable concern (see Q1)

Do not submit a report that you know to be false, misleading, or defamatory.

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#### Q3. What if I am not sure whether to use the SpeakUp Line?

**If in doubt, submit.** We will assess whether the concern falls within scope and route it to the right channel if needed.

If you would prefer to discuss a concern before submitting, you may also contact the [Compliance function](#) for guidance.

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### Q4. What if my concern has already been reported by someone else?

Submit it anyway. Multiple independent reports on the same matter strengthen the assessment.

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### Q5. Is there a time limit for submitting a report?

No. There is no minimum recency requirement. Historical concerns can be reported and will be assessed on their merits.

That said, the passage of time may affect our ability to gather evidence, review records, or reach witnesses. If you have a concern, report it as soon as possible.

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## WHO CAN REPORT

### Q6. Who can use the SpeakUp Line?

The SpeakUp Line is open to anyone who has information about a concern connected to the Company, including:

- employees, temporary staff and interns
- contractors and freelancers
- suppliers and other business partners
- customers
- shareholders and other external stakeholders
- any other individual with information about a relevant concern

You do not need to be directly affected by the conduct you are reporting.

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## HOW TO REPORT

### Q7. How do I submit a report?

You can use the following internal reporting channels:

- **SpeakUp Line** – a secure reporting platform operated by an independent third party on our behalf, available 24/7/365 and in multiple languages. You can submit a report in writing via an online form or by calling the hotline and leaving a message.
- **Compliance function** – via the online [contact form](#) or by email.

These channels are designed to ensure concerns are handled consistently, securely, and confidentially.

If you raise a concern outside these channels (e.g., with your manager, HR, or another Company representative) and it qualifies as a reportable concern (see Q1), we ensure through our Speak Up policy and training that it is kept confidential and promptly forwarded to the Compliance function.

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### Q8. Do I need evidence or proof to submit a report?

No. You are not required to provide evidence. Submit what you know. Reports should be made in good faith, meaning you reasonably believe the information is true at the time of reporting, even if it is later not confirmed.

At the same time, the more specific information you can provide (what happened, when, who was involved, how you became aware), the better we can assess and address the concern. Reports that contain only general or unsubstantiated allegations may limit our ability to take action.

If you have relevant documents or materials, you may attach or reference them.



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**Important:** Do not conduct your own investigation or take steps to gather evidence beyond your normal role. Doing so could compromise an investigation and may expose you to personal risk.

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### Q9. Can I report anonymously?

Yes, where legally permitted. Anonymous reporting is supported through the SpeakUp Line. You can submit a report without providing your name or contact details.

If you report anonymously, we encourage you to retain your report number and password (see Q23) and check back through the portal periodically. We may need to ask follow up questions, and our ability to assess the concern fully may be limited if we cannot make contact.

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### Q10. What languages can I use?

You may submit your report in any language. Reports submitted in languages other than English will be processed with the support of machine translation. Key details will be verified where necessary.

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### Q11. Can I report in person?

Yes. Where feasible or required by applicable law, in person reporting can be accommodated. To request this, please contact the Compliance function via the online [contact form](#).

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### Q12. Can I report to an external authority?

Yes. You may have the right, depending on applicable law, to report a concern to a relevant regulatory authority, law enforcement body, or other competent authority. This right exists independently of the SpeakUp Line, is not conditional on reporting internally first, and the Company does not restrict or limit your ability to report externally. We nevertheless encourage internal reporting, as it enables the Company to address concerns promptly.

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## YOUR RIGHTS AND PROTECTIONS

### Q13. What protection do I have as a reporter?

The Company prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation. Prohibited retaliation includes dismissal, demotion, harassment, exclusion, adverse changes to working conditions, or any other treatment connected to the report.

Good faith means that you reasonably believe the information you provide is true and accurate at the time of reporting. Protection applies regardless of the outcome of any assessment. Even if a concern is not substantiated, you are protected provided you act in good faith.

Reports made in bad faith are not protected and may result in disciplinary action.

Your identity (if you choose to share it) and the information you provide will be kept confidential and shared only on a need-to-know basis to assess and address the concern. Disclosure will occur only where required by law, by a court order, or where necessary to conduct an effective investigation.

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### Q14. What if I suspect I am being retaliated against?

Report it immediately through the SpeakUp Line or by contacting the Compliance function directly. The Company will follow up on all plausible allegations of retaliation. Retaliation is a serious violation of Company policy and, in many jurisdictions, of applicable law. Substantiated retaliation will result in disciplinary measures, which may include termination.

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### Q15. How is my personal data handled?

Personal data collected in connection with a report is handled in accordance with applicable data protection law and the Company's internal confidentiality and record retention requirements.

For full details on how your personal data is processed, please refer to the [SpeakUp Privacy Notice](#).

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## WHAT HAPPENS AFTER YOU REPORT

### Q16. Who receives and handles my report?

Reports submitted through internal reporting channels are received and handled through a process overseen by the Compliance function, in line with applicable legal requirements.

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### Q17. Will the process be fair?

Yes. The Company aims to handle reports and investigations in a manner that is independent, objective, and proportionate. In practice, this means:

- fact finding is conducted respectfully and objectively, without presumption of guilt
- individuals named in a report have the right to be heard, consistent with applicable law and the integrity of the process
- information is handled on a strict need to know basis, in line with confidentiality and data protection requirements
- any actual or potential conflict of interest on the part of a person involved in handling a report must be disclosed. Individuals with a conflict will not participate in fact finding or decision making for that matter

Investigators and any lawyers involved act on behalf of the Company. They do not represent the reporter or provide personal legal advice.

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### Q18. What happens after I submit a report?

We take all genuine reports seriously. Each report is reviewed by the Compliance function to assess whether there is sufficient information to proceed and to determine the appropriate next steps.

Depending on the circumstances, this may include:

- contacting the reporter, where possible, to request additional information
- conducting an initial review
- referring the matter to another function (e.g., HR, Legal, Internal Audit, Finance)
- initiating a formal investigation
- closing the report where there is insufficient information or where the reported conduct does not indicate a potential violation



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Where a formal investigation is initiated, relevant information is preserved and reviewed and, where appropriate, relevant parties may be contacted. Findings may result in appropriate actions, including disciplinary measures or improvements to controls, processes, or risk management.

We cannot guarantee a specific outcome or that a formal investigation will be initiated. All reports are assessed on a risk basis and in line with applicable legal requirements. In some cases, we may not be able to share details or outcomes of our review.

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### **Q19. What if my concern involves a senior leader or someone in the Compliance function?**

The same principles of independence, objectivity, and impartiality apply regardless of who is involved. Anyone named in, or connected to, a report will not be involved in its assessment or investigation.

This applies equally to members of the Board of Directors, the executive leadership team, and members of the Compliance or Legal functions.

Where a concern involves senior leadership or the functions responsible for handling reports, the matter is escalated to an appropriately independent level. External investigators may be engaged where needed to ensure objectivity.

The Audit Committee provides oversight where appropriate and serves as an independent escalation point.

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### **Q20. Should I preserve documents after raising a concern?**

Yes. If you become aware of a potential concern, whether or not you have submitted a report, do not delete, destroy, change, or hide any documents, messages, or records that may be relevant.

Interfering with an investigation, including destroying or concealing relevant information, is a violation of Company policy. If you are not sure whether something is relevant, keep it.

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### **Q21. What if I am contacted as part of an investigation?**

If you are approached by an investigator as a witness or potential source of information, you are expected to:

- cooperate honestly and completely, to the best of your knowledge
- treat the fact and content of the investigation as strictly confidential
- not discuss the investigation with colleagues, the subject, or anyone else not formally involved
- preserve any documents or records that may be relevant (see Q20)

You will be treated with respect throughout the process. Investigators and any lawyers involved act on behalf of the Company and do not provide personal legal advice to witnesses.

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## **FEEDBACK, TRACKING, AND FOLLOW UP**

### **Q22. Will I receive feedback on my report?**

We will provide feedback within the timeframes required by applicable law, where legally permissible and appropriate. Where the EU Whistleblower Directive applies, we will acknowledge receipt of your report within 7 days and provide feedback within 3 months. Feedback means an update on the status of your report, not necessarily the final outcome. In justified cases, this timeframe may be extended.

We may not be able to share full details or outcomes due to confidentiality, privacy, or legal constraints.

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### Q23. How do I track my report?

When you submit a report in the SpeakUp Line, you will receive a report number and be asked to create a password. These credentials allow you to access your report, add additional information, view our feedback, and communicate with us securely through the reporting portal.

Please save your report number and password securely. They cannot be recovered and are required to access your report, especially if you submitted it anonymously.

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### Q24. Can I add to or correct my report after submitting?

Yes. You can return to your report at any time using your report number and password to add information, upload documents, or make corrections.

If you submitted your report anonymously, these credentials are the only way to access your report, so please keep them in a safe place.

You are encouraged to provide additional information as it becomes available, as this can help us assess your concern more effectively.

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### Q25. Can I withdraw my report?

No. Once a report is submitted, it cannot be withdrawn. The Company will assess the report based on the information provided and determine the appropriate next steps.

The decision whether to review or investigate a matter rests with the Company.

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## IF A CONCERN OR INQUIRY IS RAISED WITH YOU

### Q26. What if a concern is raised with me directly, as a manager or colleague?

If someone raises a concern with you informally (e.g., in a conversation or message) that qualifies as a reportable concern (see Q1), you should:

- encourage the individual to report through the SpeakUp Line
- promptly escalate the concern to the Compliance function
- not investigate or attempt to resolve the matter yourself
- keep the information confidential and share it only on a need-to-know basis
- not discourage reporting through the SpeakUp Line
- not tolerate or engage in retaliation

**Important:** For managers and HR personnel, escalation to the Compliance function is mandatory.

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### Q27. What if I am contacted by a regulator, law enforcement, or the media?

If you are approached in connection with alleged misconduct or a potential legal issue involving the Company, notify the Compliance function promptly via our [contact us form](#).

Unless you are legally required to respond immediately, do not provide statements, documents, or information on your own. Early escalation ensures the Company can respond through the appropriate channels and support you in meeting any legal obligations.

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