

TRAXYS SARL

INTEGRITY CONCERNS HANDLING AND NON-RETIALIATION POLICY AND PROCEDURE

This policy and procedure applies to Traxys Sarl and its subsidiaries worldwide.

Traxys' reputation for integrity depends upon the actions of its officers, directors and employees. If you believe that you or others such as an employee, supervisor, client, supplier or other third party may have, while acting with or for Traxys, violated the law or Traxys' policies or Code of Conduct, you must notify your supervisor, the Legal Department or the Human Resources Department. If you are in a supervisory position, you have an additional responsibility to take appropriate steps to stop any misconduct that you are aware of and to prevent its recurrence. Concerns relating to an employment relationship, discrimination or harassment must be reported to the Human Resources Department.

If you believe your concern has not been appropriately handled or investigated or you believe your concern will be more effectively handled through other channels or would prefer to report your concern anonymously, you may contact the Integrity Hotline that is operated by an independent third party (see details under separate cover) or use the confidential telephone number or email address below.

Concerns reported will be treated confidentially and may be reported anonymously. When appropriate, the substance of the claims will be investigated and, if warranted, disciplinary action up to and including termination may be taken. The independent provider of the Integrity Hotline is responsible for compliance with applicable laws and standards on data privacy in relevant jurisdictions.

Traxys will not retaliate, discriminate or tolerate any direct or indirect acts of retaliation or discrimination against any employee for reporting, in good faith, any integrity concerns or any suspected breach of the law or of Traxys' policies or Code of Conduct. Traxys prohibits retaliation against any person who participates in an investigation of suspected misconduct. Retaliation is a violation of Traxys' Code of Conduct, may constitute grounds for dismissal and may also constitute a violation of law. Traxys will investigate all allegations of retaliation and any individual found to have engaged in retaliation shall be subject to discipline, up to and including termination of employment and, if warranted, prosecution or notification to government authorities.

INTEGRITY HOTLINE: INTEGRITY@TRAXYS.COM - [+1 212 407 1060](tel:+12124071060)