

# Speak Up - Guidelines

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**Speak Up.** Act with integrity. **Always.**

Your voice matters. If something doesn't feel right, **Speak Up**



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# Why Speak Up matters

**Speak Up** is 74Software's dedicated and **confidential channel** for **raising ethics concerns** or seeking guidance when something may not be aligned with our [Code of Ethics](#), internal policies or applicable laws.

It also supports our commitment to the principles of the EU Whistleblower Protection Directive: [Directive \(EU\) 2019/1937](#), which sets common minimum standards for protecting people who report breaches of EU law.

**Speak Up is not simply an application.** It is **part of how we build trust**, act with integrity and protect the way we work. You do not need to have all the facts or be certain that something is wrong to raise a concern. If something does not feel right, act with integrity. Always. Speak Up.

Concerns raised in good faith will be reviewed seriously, fairly and with appropriate confidentiality.

## Four principles

### Confidentiality

Your concern will be handled with care and appropriate confidentiality, in line with applicable laws and internal procedures.

### Anonymous

You can choose to raise your concern anonymously.

### Fair

If you raise a concern in good faith, it will be taken seriously and reviewed fairly.

### No retaliation

You are protected from retaliation when you raise a concern in good faith. Retaliation is not tolerated.

# Who can use Speak Up?

Speak Up is available to employees and external stakeholders who need to raise an ethics concern or seek guidance.

It can be used by:

## **Employees**

Anyone working at 74Software who wants to raise a concern or ask for guidance.

## **Contractors and temporary workers**

People working with us who may need to raise a concern related to 74Software activities.

## **Partners, suppliers and customers**

External stakeholders may also use Speak Up where the concern relates to 74Software, our people, our business or our code of ethics.



## **Practical information**

### **Available 24/7**

Speak Up is available every day, at any time.

### **Independent provider**

The platform is administered by an independent provider.

### **More than 75 languages**

The service supports reporting in multiple languages.

### **Confidential and safe**

Reports are handled with appropriate confidentiality and in line with applicable laws and procedures.



## **Resources**

### [Code of Ethics](#)

Code of Ethics training [Axway University](#) and [SBS University Ethics and Anti-Corruption corporate page](#)

# What can be reported

## What can be reported through Speak Up?

### **Business integrity and compliance**

Concerns related to corruption, *bribery*, fraud, conflicts of interest, anti-competitive behaviour, trade sanctions, export controls, regulatory breaches, or misuse of intellectual property.

### **Financial integrity and fraud**

Concerns involving accounting, audit, financial or non-financial reporting, expense claims, reimbursements, recruitment fraud, identity verification, or insider trading.

### **People, human rights, and workplace conduct**

Concerns related to discrimination, harassment, sexual harassment, retaliation, unfair or unsafe working conditions, child labour, forced labour, or other human rights violations.

### **Privacy, confidentiality, and information security**

Concerns involving personal data protection, unauthorized disclosure of confidential information, cybersecurity risks, or improper handling of sensitive company, customer, employee, or partner information.

### **Misuse of company resources or assets**

Concerns involving theft, misuse, misappropriation, or improper use of 74Software assets, resources, systems, tools, data, or funds.

### **Retaliation**

Any form of retaliation against someone who raises a concern in good faith, participates in an investigation, or supports another person in doing so.

## Outside Speak Up scope

### **Career or employment matters**

Topics such as performance evaluations, remuneration, career development, internal mobility, hybrid working, contract termination, or other individual HR matters should normally be raised with your manager or Country HR.

### **Compensation and payroll issues**

Late payment, payroll errors, benefits administration, or other compensation-related queries should be directed to Country HR or payroll support.

### **Operational or workload matters**

Project allocation, workload, team organization, or day-to-day operational issues should normally be discussed with your manager.

### **IT support issues**

Technical problems, access requests, system incidents, or workplace technology issues should be reported through the standard IT support channel ***Anywhere Service Portal***.

### **Security or workplace safety issues**

Cybersecurity incidents *security office* or urgent workplace safety issues should be reported immediately through Country HR.

### **Workplace environment issues**

Office maintenance, facilities, equipment, workspace, or physical work environment matters should be reported through the relevant Facilities in your country.

# When something doesn't feel right: before you act, ask yourself

When something does not feel right, you do not need to have all the answers. Use these simple steps to reflect, seek guidance and raise a concern when needed. Follow these steps:

## Notice the signal

If a situation makes you uncomfortable, or something does not feel right, pay attention to that signal.

Before taking action, consider whether the situation could affect our people, our customers, our business, or the trust we are expected to protect.

## Check against our standards

Ask yourself:

- Is this aligned with our Code of Ethics?
- Is it consistent with our internal policies and applicable laws?
- Does it reflect the way we want to work at 74Software?
- Could it put our people, our business, our customers, or our culture at risk?

Integrity means making the right decision, even when the situation is complex or there is pressure to act quickly.

## Raise the concern

If the concern remains, or if you believe something may be inconsistent with our Code of Ethics, internal policies or applicable laws, use [Speak Up](#).

You do not need to have all the facts or be certain that something is wrong. Raise your concern in good faith.

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# When something doesn't feel right: How managers, HR and leaders can support you

You may choose to raise a concern directly through [Speak Up](#), but you may also speak first with a manager, HR or another trusted leader.

When this happens, managers and leaders have a responsibility to respond in a way that protects trust and supports you.

They should:

## **Listen carefully**

Make time to listen without judgment. Thank the person for speaking up and acknowledge that raising a concern may not have been easy and redirect the person to the Speak Up platform

## **Guide or escalate appropriately**

Managers are not expected to investigate ethics concerns themselves. The concern should be escalated through the appropriate channel Speak Up where relevant.

## **Avoid retaliation**

Any form of retaliation against someone who raises a concern in good faith is not tolerated.

# What happens after a report is submitted

When you raise a concern, we listen and take it seriously.

## We assess

We review the concern and decide the appropriate next step. This may include guidance, referral to another channel, management action or investigation.

## We investigate

Where appropriate, we conduct a fair and objective investigation, reviewing the facts and involving only those who need to know.

## We act

We determine the outcome and take appropriate action where needed, while respecting confidentiality and applicable legal requirements.

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# How to report a concern

Speak Up is a user-friendly and self-guided platform. It will guide you through the reporting process and help you provide the relevant information about your concern.

You do not need to have all the facts before raising a concern in good faith. If something does not feel right, Speak Up.

When submitting a report, you will receive a personal code and password. Please keep them safe, as they will allow you to access your case, provide additional information and follow up on updates.

Detailed platform instructions are available in the appendix.

## Practical information

### Speak Up access

Speak Up can be accessed online through the Speak Up application. [Speak Up](#)  
Once in the application, you can choose how to raise your concern:

- **Web form:** submit your concern directly through the online form.
- **Telephone line:** raise your concern by phone, free of charge.

**74Software**