



# SoftwareOne

## External Reporting Policy

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External Reporting Policy  
Legal & Compliance

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# External Reporting Policy

## Legal & Compliance

### 1. Key Elements

The reporting facilities of SoftwareOne are the [Integrity Line](#) and the **External Reporting Telephone Lines**. **This External Reporting Policy** describes the confidential avenues for third parties to report concerns about unethical or illegal activities related to SoftwareOne, underscoring SoftwareOne's commitment to transparency, integrity, and accountability.

### 2. Scope

This policy applies to third parties, including clients and other external entities, who wish to report concerns or potential misconduct related to SoftwareOne's operations.

**This policy is crafted in alignment with SoftwareOne [Code of Conduct](#).**

### 3. Overview

SoftwareOne has put in place the [Integrity Line](#) and the **External Reporting Telephone Line** to allow third parties to report concerns or potential misconduct. This, in line with the [EU Whistleblower Protection Directive \(Directive \(EU\) 2019/1937\)](#), reinforces SoftwareOne's commitment to ethical operations and transparency.

### 4. Confidentiality

Reporters have the option to submit their concerns anonymously, either in writing using the [Integrity Line](#) or by calling an External Reporting Telephone Line. Whether a report is made anonymously or not, all information shared with SoftwareOne will be treated with the utmost discretion and confidentiality. Details that could potentially reveal the identity of a reporter will be handled with care, ensuring that anonymity is preserved where it has been requested.

### 5. Integrity Line

Third parties are encouraged to report wrongdoings at SoftwareOne using the [Integrity Line](#). To facilitate investigations, reporters are requested to:

1. Note down the assigned incident number and corresponding password as these credentials facilitate the secure communication with SoftwareOne.
2. Share a factual account of what was observed, including names, dates, times, locations and other relevant details.
3. Share supporting evidence such as files, photographs, emails, text messages, documents etc., that can be uploaded to the Integrity Line to substantiate reports.
4. Consider disclosing their identity as this can significantly aid the investigation process.

## 6. External Reporting Telephone Line

The External Reporting Telephone Line provides a direct, anonymous channel to the compliance team, free of charge. It is available in Italian, English, Spanish and German.

### 6.1. Accessing the External Reporting Telephone Line

SoftwareOne has made it easy and straightforward for third parties to voice their concerns or report potential misconduct through our dedicated External Reporting Telephone Line. The line is available free of charge for in country calls, ensuring that all stakeholders can communicate their concerns without incurring any costs.

The External Reporting Telephone Line is accessible worldwide and equipped with a recording feature to capture all details of a report.

**For a full list of the available telephone lines and in-country numbers see [ANNEX: Country Specific Reporting Provisions](#).**

The contact numbers are exclusively for the purpose of the External Reporting Telephone Line and will only be used for the reporting of concerns or potential misconduct related to SoftwareOne's operations. They are not available for customer support.

Additionally, reports relating to misconduct may be escalated to external authorities, such as the [European Anti-Fraud Office](#) ('OLAF') or the [European Securities and Markets Authority](#) ('ESMA'). In case of emergencies, you can also refer to the police or other relevant external authorities.

For more information, please refer to the [list of relevant external authorities](#) and their contact details.

### 6.2. Documentation Process

1. When using the **External Reporting Telephone Line**, a report is made via the recorded telephone line or another registered voice messaging system:
  - a) With the implied consent of the reporting individual, the conversation may be recorded on a durable medium that allows access to the information.
  - b) Alternatively, a complete and accurate transcription of the conversation can be made by the staff responsible for handling the report.
2. **If a call is answered by an employee during office hours**, the account of the conversation will be documented by the employee.

### 6.3. Investigation Process

Following the submission of a report, either through the Integrity Line or the External Reporting Telephone Line, a SoftwareOne Compliance Officer will conduct an investigation, to assess the necessity for action and to determine the subsequent course. If possible and in safeguarding confidentiality, the investigating Compliance Officer will keep the reporter informed about the progress and anticipated timeline of the investigation.

## 7. Compliance Email

Third parties who are unable to use the afore-listed reporting tools or prefer to make a direct report, SoftwareOne also offers a dedicated compliance email address. You can report any potential misconduct, violation of company policy, or unlawful activities to <mailto:compliance.global@softwareone.com>.

Note that whilst you can choose to remain anonymous by using the disclosure tools, the Compliance Email does not guarantee anonymity due to the nature of email systems. However, all reports received through this channel will be treated with the utmost confidentiality and professionalism. All information shared will be used solely for the purpose of investigating and addressing the reported concerns.

## 8. Policy Compliance

This policy is effective as of \*Last updated date\*.

## 9. Definitions

Term	Definition
<i>Integrity Line</i>	<i>SoftwareOne secure reporting system for Wrongdoings as per the Integrity Line Reporting Policy.</i>

## 10. References

[SoftwareOne Code of Conduct](#)

[ANNEX: Country Specific Reporting Provisions](#)

## 11. Document Review History

Policy exceptions must be approved by \*Policy Owner Name\* and documented appropriately.

Reviewed by: Head of Compliance

Date of Review: 14/11/2024

Approved by: Chief Legal Officer

Date of Approval: 14/11/2024

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Next Review Date\* as per annual review cycle:

	Date of release	Version	Author (s)	Reviewer	Approver	Change Description
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Serial No.	14/11/2024	1.00	Global Compliance manager	Head of Compliance	Chief Legal Officer	New Policy
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