

## **Bloomreach Whistleblowing policy** (Global)

### **INTRODUCTION**

It is of the utmost importance for Bloomreach to ensure and demonstrate commitment to our employees and [our values](#).

The purpose is to provide and promote a safe environment for an individual to raise any concerns and the early and effective resolution of risks to any situation and/or the public interest (if applicable).

In this context, Bloomreach wants to enable individuals to report concerns related to misconduct or breaches not only to our values but any potential breach of law that, in light of the circumstances and the information available to a reporting person at the time of reporting, they have sufficient ground to believe that the matters reported by them are true, without fear of retaliation.

### **TO WHOM IS THIS POLICY/PROCEDURE RELEVANT**

#### **Who can raise a report?**

A reporting person is an individual who falls under the following categories, considering either current or former:

- Employees (workers) - This is a wide definition that includes not only Bloomreach employees but any individual who performs services for and under the direction of another person within Bloomreach, in return for remuneration. Therefore, this policy covers workers in non-standard employment relationships, including fixed-term workers, agency workers and other atypical relationships;
- self-employed individuals, including freelance workers, contractors and subcontractors and those working under the supervision/direction of contractors, sub-contractors and vendors;
- volunteers;
- trainees (paid or unpaid);
- Prospective new recruits who have not yet commenced work or are still in the recruitment process;
- facilitators (someone who assists a person in the reporting process in a work-related context)
- third persons connected with a reporting person who could suffer work-related retaliation (e.g., colleagues or relatives);
- legal entities that the reporting person is connected to in a work-related context;
- shareholders;
- members of an undertaking's administrative, management or supervisory body.

#### **What can be reported?**

The aim of this policy is to govern the process to report a breach of law in, among others, any of the following areas that may relate to Bloomreach activities:

- procurement (e.g. bribery in connection to the procurement proceedings)
- prevention of money laundering and terrorist financing (e.g. conversion or transfer of money coming from criminal activities)
- product safety and compliance (e.g. infringement of right to a trademark)
- transport safety (e.g. breaching rules relating to transport)
- protection of the environment (e.g. illegal waste manipulation)

- public health (e.g. conduct risky to public health and safety)
- consumer protection (e.g. introduction of goods/services to the market while concealing its significant defects)
- protection of privacy and personal data, and security of network and information systems (e.g. GDPR related breaches)
- breaches affecting the financial interests of the country of residence (e.g. EU subsidies related frauds)
- breaches relating to antitrust and market power regulation (e.g., abuse of dominant market position).

In addition to the above, local laws might specify further areas falling under the whistleblowing protection.

The reporting person should reasonably believe that the submitted information and evidence (if any) about actual or potential breaches, which occurred, or are very likely to occur at Bloomreach in a work-related context is true and accurate.

Persons submitting such information in good faith are protected against retaliation from Bloomreach. Please note that reporting knowingly false information may have legal consequences, such as termination, potential criminal charges for false accusation and no whistleblower protection.

Please bear in mind that this policy does not cover personal grievances and complaints. Reporting obligations and protections for such actions are specifically set forth in our Code of Conduct policy and geo-specific Sexual Harassment policies.

In Europe, the reporting persons qualify for protection under the [DIRECTIVE \(EU\) 2019/1937](#).

### **How can I raise a report?**

In order to raise a report, please visit <https://bloomreach.whistlelink.com/>.

Bloomreach will use reasonable efforts to acknowledge the receipt of the report to the reporting person within seven days of the submission.

Bloomreach must provide a response to the report within three months from the acknowledgement of receipt, or if, for any reason, no acknowledgement was sent to the reporting person, three months from the expiry of the seven-day period after the report was made.

The response can include:

- a request to the reporting person to provide further information in order to be able to open an investigation,
- a referral to other channels in the case of reports exclusively affecting individual rights of the reporting person and/or is not in the scope of this policy,
- launch of an internal enquiry and, possibly, its findings and any measures taken to address the issue raised,
- referral to the local competent authority for further investigation,
- closure of the procedure based on a lack of sufficient evidence or information.

If an investigation proceeds, the reporting person will be informed of the investigation's progress and outcome.

It is important to note that this process does not supersede the right of the reporting person to report to the competent authority in cases they consider necessary to do so. Furthermore, making a report

pursuant to this Policy does not relieve a reporting person from the obligation to report a crime under applicable local law, if required by law.

**Local variances**

This is a general policy for all countries in which Bloomreach operates. Bloomreach shall follow the applicable laws of the country involved when a report is opened.

In cases of conflict between the text of this policy and the local law variances, the local law variances prevail.

**Reports and personal data**

Any processing of personal data associated with this policy shall be done in accordance with the [Bloomreach Privacy Policy](#). The reports will be stored for no longer than it is necessary, in accordance with applicable law.

**Duty of Confidentiality**

Bloomreach has a legal obligation to respect the reporter's wishes to maintain anonymity. Therefore as a reporter, you are not obliged to disclose your identity. Bloomreach shall keep the identity of the reporter (if so disclosed by the reporting person), the report, and its content confidential at all times. This means that only a limited number of people designated by Bloomreach may handle the reports and have access to any documents revealing the identity of the reporting person.

Please note that Bloomreach may be required by law to disclose the identity of the reporting person (and if it was not disclosed in the report, the case handler may ask for the identity of the reporter) in cases where there's a legal obligation to do so, e.g., to raise the report to the competent authority or in case of a potential criminal offense.

For the purposes of an investigation, a case handler may need to disclose within Bloomreach (e.g., to the management, on a need-to-know basis) the report and/or any additional documents. The documents that will be passed on will be anonymized to conceal the identity of the reporting person.