

Speak-Up Policy and Procedure External SkyCell AG

Introduction

A person who reports on a wrongdoing of a person or entity is doing so in good faith. It is someone who makes a disclosure in the public interest. This Policy describes how SkyCell will support you to safely express your concerns, whom to contact, and how SkyCell will protect you and your identity.

General Procedure

Who can Report?

All current and former employees, contractors, suppliers and their employees and subcontractors, partners, directors, and all other concerned stakeholders are eligible persons to make reports. In addition, all relatives and dependents of the before mentioned are eligible.

What can be reported?

Concerns regarding the following topics can be reported: Labor practices, child labor, forced labor, human trafficking, working conditions, health & safety, discrimination, harassment, environment, corruption, conflict of interest, fraud, money laundering, anti-competitive practices, information, and data security (breaches), bribery.

How to report?

The following contact details can be used to report conduct:

- Your SkyCell point of contact
- info@skycell.ch (SkyCell Info Address)
- compliance@skycell.ch (SkyCell Compliance Service)
- skycell.integrityline.com (online Speak-Up-Hotline. The protection of your identity has the highest priority. Anonymous reporting is possible).

Our Policy

Who is eligible to speak up?

Eligible is someone who reports misconduct of a person or entity in good faith. It can also include someone involved in this misconduct and wanting to make amends (e.g., someone who has accepted a bribe). A person who speaks up can be anyone from one of the following groups: current and former employees, contractors, suppliers, and their employees and subcontractors, partners, and directors. In addition, all relatives and dependents of the before mentioned are eligible. Excluded from the previously mentioned group is anyone currently or was formerly involved with any of SkyCell's competitors.

What can be reported?

You can report on anything for which you have a reasonable justification. Reportable conduct includes but is not limited to the following topics: labor practices, child labor, forced labor, human trafficking, working conditions, health & safety, discrimination, harassment, environment, corruption, conflict of interest, fraud, money laundering, anti-competitive practices, information, and data security (breaches), bribery.

Identity Protection

A person should indicate her/his name when reporting misconduct to ensure the report is made in good faith. However, when using the Hotline skycell.integrityline.com, the reporting party's identity is protected and will be kept anonymous.

It is possible to report anonymously via the Hotline. However, should a person submit a report anonymously, it can make it, depending on the matter, difficult to clarify and investigate the situation and ultimately solve the reported subject. When a reporter chooses to disclose her/his identity, it will only be shared with additional personnel when she/he I) provides consent or II) SkyCell is required by law to do so.

Protection

SkyCell does not accept any form of misconduct against a reporting party. SkyCell will thus take all reasonable steps to protect a person from retaliation and/or detriment and to ensure anonymity and immunity. However, if you are involved in the misconduct, SkyCell might be required by law to disclose your identity to the authorities.

Investigation of a Report

SkyCell will take all reports seriously and assess carefully if a thorough investigation is required. The investigation procedure will vary depending on the type of misconduct. However, SkyCell will ensure a fair, efficient, and independent process. In addition, SkyCell will provide appropriate feedback to the reporter.

Following an investigation, the conclusion can be reached that the report was deliberately false or made in bad faith (e.g., out of spite or for personal gain). To protect the functionality of the Hotline, this could result in legal action against the reporter.

Targets

- Continuously have 0 reports of misconduct.
- If a conduct was reported, the goal is to:
 - Provide feedback to the reporter within one month after the incident was reported.
 - Have investigated and solved the conduct within three months after the conduct was reported.