



External Whistleblowing Policy

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1 About this Policy

All subsidiaries and affiliated companies in Osy Technologies S.à.r.l. (the “NSO Group”) are committed to conducting NSO Group’s – our – business with honesty and integrity. Any suspected wrongdoing should be reported as soon as possible.

This Policy covers all employees, contractors, partners, officers, and directors of the NSO Group, as well as any external person or body who wishes to express a grievance in the areas covered by this Policy.

2 What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to NSO Group’s activities or products. This may include, for example, bribery and corruption misconduct; the inappropriate use/misuse of the NSO Group’s products and/or services and resulting adverse human rights impact by any person, including employees, officers, directors, consultants, contractors, customers, or other NSO Group representatives or partners.

3 How to Raise a Concern

If you wish to report a wrongdoing as detailed above, you should contact NSO Group’s confidential designated whistleblowing email account: whistleblowing@nsogroup.com.

A meeting may be arranged with you to discuss your concerns. You may bring someone to accompany you to any meetings related to this Policy; he/she must guarantee the confidentiality of your disclosure, and they must keep confidential any subsequent investigations or proceedings which may be disclosed with you.

4 Anonymity and Confidentiality

While we also accept anonymously raised concerns, we would like to emphasize that the best results in effectively addressing concerns and resolving issues are typically achieved by interacting with the assigned team of investigators. Without further interaction, any anonymously raised concern must have sufficient substance to warrant an investigation, i.e., a clear, complete, identifiable and true description of the potential wrongdoing or threat, when it has occurred or will occur, who was or is involved, supporting evidence or circumstance, as well as any immediate action recommended to divert further harm.

If you want to raise confidential concern, every effort will be made to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.



5 Investigation and Outcome

Once you have raised a concern, an initial assessment will be carried out to determine whether this concern should result in an investigation, and if so - the scope of any such investigation. You may be required to attend meetings to provide further clarifications or information. Due to legal or commercial restrictions, you may not be informed of the outcome of the assessment.

In cases which justify such, NSO Group may appoint an investigator or a team of investigators; this may include staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for remedial action to enable us to minimize the risk of future wrongdoing.

In instances where it is permissible by law, and by NSO Group's policies and contractual obligations, we may keep you informed of the progress of the investigation and its conclusion. However, occasionally the need for confidentiality may prevent giving you specific details of the investigation, or any resultant actions. You are obligated to treat any information about the investigation disclosed to you as confidential.

While the outcome you are seeking cannot be guaranteed, your concerns will be dealt with fairly and in an appropriate way. Use of this Policy helps achieve its intended goals.

6 Protection and Support for Whistleblowers

This Policy aims to encourage openness and will support whistleblowers who raise genuine concerns related to this Policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any unfair or detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, immediately inform the General Counsel of NSO Group, at the whistleblowing email account.

It is strict NSO Group policy that employees, contractors, officers, directors and consultants must not threaten or retaliate against whistleblowers in any way.

We may take legal action against a whistleblower that has made false allegations maliciously or with a view to personal gain.