



Internal 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, consultants, officers, and directors of the NSO Group and will form integral part of internal trainings.

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 the following:

- a. criminal activity;
- b. failure to comply with all laws and regulations;
- c. danger to health and safety;
- d. bribery as set out in the NSO Group Anti-Bribery and Corruption Notice and Policy;
- e. inappropriate use/misuse of the Group’s products and/or services and resulting in adverse human rights impact by any person, including employees, officers, directors, consultants, contractors, customers, or other NSO Group representatives or partners;
- f. financial fraud or mismanagement, or breaches of anti-money laundering laws;
- g. breach of NSO Group’s policies and procedures;
- h. conduct likely to damage our reputation or financial wellbeing;
- i. unauthorized disclosure of confidential information; and,
- j. the deliberate concealment of any of the above noted matters.

3 How to Raise a Concern

We hope that in most cases you will be able to raise any concerns with your supervisor. Your supervisor has received appropriate training in accepting and handling your concerns. If, however, for some reason you prefer not to communicate with your supervisor, or if your supervisor is not responsive, you should contact any of these contact persons or means:

- a. Chairman [Stefan Kowski]
- b. CEO [Shalev Hulio]
- c. General Counsel [Shmuel Sunray]
- d. Compliance function



- e. NSO Group's confidential compliance email account: whistleblowing@nsogroup.com.

A meeting will be arranged with you as soon as possible to discuss your concerns. You may bring a colleague to any meetings related to this Policy; they must guarantee to respect the confidentiality of your disclosure and any subsequent investigations or proceedings that might be disclosed to 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. Subsequently, you will be informed of the outcome of the assessment. You may be required to attend meetings to provide further clarifications or information.

In cases which justify such, NSO Group may appoint an investigator, or a team of investigators; this might 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.

Every effort will be made to keep you informed of the progress and result of the investigation. However, occasionally the need for confidentiality may prevent providing you details of the investigation. You are obligated to treat any information about the investigation as confidential.

6 If You are Unsatisfied

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.

If you are unhappy with the way in which your concern has been handled, you can raise it with one of the contacts listed in section 3 above.



7 External Disclosures

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone external.

The law recognizes that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator.

8 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.

It is strict NSO Group policy that employees, consultants, officers, and directors must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you will be subject to disciplinary action.

A whistleblower that has made false allegations maliciously or with a view to personal gain, may be subject to disciplinary action.