

Bolt Whistleblower Policy - RCMS-POL-01.04.07.03

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- 1. Purpose
- 2. Policy
 - 2.1 Reporting categories
 - 2.2 Who can report
 - 2.3 Protection Rights of the Reporter
 - 2.3.1 Non-Retaliation Commitment
 - 2.3.2 Confidentiality & Anonymity Commitment
 - 2.4 Reporting Process
 - 2.4.1 First-line reporting channels
 - 2.4.2 Whistleblowing Tool
 - 2.4.3 External reporting
 - 2.4.4 Reporting in bad faith
 - 2.4.5 Self-reporting
 - 2.4.6 What's out of scope of the Whistleblower Policy
 - 2.5 Investigation Process
 - 2.5.1 Initial assessment
 - 2.5.2 Investigation flow
 - 2.5.4 Possible actions
 - 2.5.5 Appeals
 - 2.5.6 Impartiality of the Ethics Committee
 - 2.6 Communication & Timelines
 - 2.7 Documentation, Data Privacy and Protection
- 3. Responsibilities
 - 3.1 The Ethics Committee
 - 3.2 Investigators
 - 3.3 Reporters
 - 3.4 The Company
- 4. Policy Review

1. Purpose

At Bolt, we believe in fairness, integrity, and following our company values, while also adhering to relevant laws and regulations. Despite our commitment to these principles, you may encounter behaviour that goes against laws, our [Code of Conduct](#), or Bolt policies. It's crucial to speak up if you experience or witness misconduct. Your voice helps us maintain our reputation, success, and ability to operate effectively.

Staying silent about suspected misconduct can worsen the situation and erode trust. Bolt values and encourages anyone to report potential misconduct. Your concerns will be treated confidentially, and you can choose to remain anonymous if you prefer. We want to assure you that you will not face retaliation for raising concerns in good faith.

This policy is designed to provide guidance on when, how, and where you can report concerns about suspected misconduct without fear of retaliation. It also outlines what you can expect from Bolt when you raise a concern and the steps we will take to address it.

This global policy is a minimum internal guideline standard. Where there is an unregulated matter or a conflict arises between local legislation and this policy, the local legislation of the country shall apply.

2. Policy

2.1 Reporting categories

Reporting categories that may warrant a Whistleblower report (not an exhaustive list) include:

- Violations of company policies and regulations, including:
 - Gifts and entertainment rules
 - Improper use of company resources
 - Disclosure of confidential information
 - Conflicts of interest
 - Violation of Human Rights
 - Drug, alcohol, or substance abuse
 - Bribery or corruption
 - Violation of privacy rules
- Financial integrity and compliance issues, such as:
 - Suspected irregularities of a financial nature
 - Fraud and fraudulent reporting
 - Violations of financial controls and auditing matters
 - Breaches affecting the Company's financial interests
- Workplace misconduct and ethical concerns, including:
 - Discrimination, harassment or sexual harassment
 - Abuse of power, intimidation or bullying
- Environmental, health, and safety matters, encompassing:
 - Environmental impact
 - Safety and health concerns
 - Protection of the environment and public health
- Legal and regulatory compliance breaches, covering:
 - Violations of laws and regulations
 - Breaches relating to public procurement
 - Breaches of competition and State aid rules
- Product and service integrity, including:
 - Product safety and compliance
 - Consumer protection
 - Financial services, products, and markets integrity

2.2 Who can report

Any individual working with Bolt can report an issue per the above categories, this includes candidates, employees, former employees, self-employed persons, shareholders and persons belonging to the administrative, management or supervisory body of Bolt, volunteers and trainees, any persons working under the supervision and direction of contractors, subcontractors and suppliers, persons who help whistleblowers in a confidential manner, persons connected to a whistleblower who might suffer retaliation at work, and legal entities linked to the whistleblower (hereafter - Reporter).

2.3 Protection Rights of the Reporter

2.3.1 Non-Retaliation Commitment

Bolt is committed to fostering a culture of transparency and accountability. We unequivocally prohibit any form of retaliation against Reporters who come forward with concerns or reports of misconduct. Reporters who report in good faith will be protected from any adverse actions, including but not limited to termination, demotion, harassment, or discrimination. Any instances of retaliation will be promptly investigated and appropriate disciplinary action will be taken against the responsible parties.

2.3.2 Confidentiality & Anonymity Commitment

We recognize the sensitivity and confidentiality of whistleblowing reports. Reporters are encouraged to report concerns through designated channels with the assurance that their identity will be protected to the fullest extent possible. Confidentiality will be maintained throughout the investigation process, with information disclosed on a need-to-know basis only. Additionally, Reporters have the option to report anonymously, further safeguarding their privacy and ensuring their comfort in coming forward. We are committed to handling all whistleblowing reports with the utmost discretion and respect for the confidentiality of those involved, reinforcing our dedication to promoting a safe and ethical work environment.

2.4 Reporting Process

2.4.1 First-line reporting channels

In the first instance, Reporters are encouraged to report suspicions through standard Bolt reporting procedures. Standard Bolt reporting procedures are to contact via slack, telephone, service desk, in person, or email:

- For employees: your Manager or your Manager's Manager; and/or your People Advisor / People Partner or another member of the People team you feel comfortable speaking to;
- For other Reporters: a designated point of contact at Bolt, such as the individual or team overseeing the relevant contractual or supervisory relationship, or any other Bolt representative you feel comfortable approaching.

2.4.2 Whistleblowing Tool

In case a Reporter does not feel comfortable or otherwise does not wish to make the report through the standard Bolt reporting procedures, the Reporter can use a reporting line ("whistleblowing tool") available through the [Webpage](#) which ensures the anonymity of the Reporter if you wish to report anonymously. The whistleblowing tool is hosted by an independent third party ([SpeakUp](#)) and reports can be made both in English and in your local language. Through this whistleblowing tool, reports can be made directly to the Ethics Committee made up of:

- General Counsel & Company Secretary;
- Vice President of People;
- Internal Audit representative; and
- Diversity & Inclusion Manager

2.4.3 External reporting

If reporting internally is not feasible or appropriate, such as in cases involving criminal activity or immediate medical emergencies, Reporters may directly report to law enforcement or relevant public authorities.

2.4.4 Reporting in bad faith

Reporting in bad faith occurs when a Reporter deliberately submits a report or complaint with the intention to deceive, cause harm, or manipulate the whistleblowing process. Such reports are not made out of a sincere belief that wrongdoing has occurred, but rather out of malice, spite, or a desire to harm another person or the organization. Bolt takes the practice of reporting in bad faith very seriously. This act is considered a violation of ethical standards and may result in appropriate actions, including legal measures or termination of engagement, depending on the relationship of the Reporter with Bolt. For employees, this constitutes a breach of the [Code of Conduct](#) and employment agreement, and Bolt reserves the right to take disciplinary action. For other Reporters, Bolt reserves the right to take proportionate actions, including termination of contracts or other applicable measures.

2.4.5 Self-reporting

If you have committed a breach of company policies and would like to come forward about it yourself, you may do so using any reporting line mentioned in this policy. Your honest confession will be seen as a mitigating factor in deliberating what action the company will take.

2.4.6 What's out of scope of the Whistleblower Policy

Topics not intended for handling through the Whistleblower Policy:

- for issues or grievances you may have in relation to your employment (e.g., your terms of employment or performance-related issues): for HR-related matters, your direct manager and/or People Partner/Advisors are the primary points of contact;
- for events presenting an immediate threat to life or property: in these cases notify your direct manager, Workplace manager or local authorities immediately;
- to settle personal disputes;

- to obtain answers to questions or to provide comments on policies/procedures or interpretation of their applicability: in these cases turn to the process or policy owner;
- to make accusations which you know are false or cannot be substantiated, i.e. malicious intent.

2.5 Investigation Process

2.5.1 Initial assessment

Each report receives an initial triage by the Ethics Committee to assess the necessary level of action. Some reports may not warrant a full investigation, but can be immediately acted upon by the People & Workplace, Legal or Internal Audit teams.

2.5.2 Investigation flow

Our general process flow for the Investigation Process is detailed below:

- **Receiving Notification:** The Ethics Committee receives an email notification regarding the report, holds an initial triage, and has the case assigned to an impartial and non conflicted investigator to carry out an impartial investigation.
- **Contacting and Interviewing the Reporter:** The investigator contacts the Reporter for further information, conducts an interview and gathers any possible evidence.
- **Interviewing Involved Parties:** Interviewing subject(s) implicated, witnesses, and individuals with relevant information.
- **Reviewing Records and History:** Reviewing records, including documents and the history of both the Reporter and subject(s).
- **Keeping all parties informed of the investigation timeline and next steps throughout the process**
- **Evaluating Findings and Credibility:** Reviewing findings, assessing credibility, and determining action items. Ensuring all documents and evidence are securely stored for potential verification and external arbitration.
- **Reporting to the Ethics Committee:** Providing the Ethics Committee with an overview of the findings and proposing an action plan.
- **Implementing Solutions:** Implementing determined solutions after confirmation from the Ethics Committee.
- **Case Closure:** After all necessary steps have been taken, the case will be closed.
- **Follow-Up:** Following up with the Reporter and impacted individuals, ensuring closure and addressing any ongoing concerns.

More detailed guidance and steps for the investigators are laid out in the Investigation Handbook.

2.5.4 Possible actions

The actions we take will align with laws, internal policies, and procedures, and may include dismissal, demotion, or termination, following the principle of proportionality to the offense.

2.5.5 Appeals

In case of a dispute regarding the outcome of a report/investigation, each party has the right to appeal to the Ethics Committee to review the decision:

- Directly contact any member of the Ethics Committee via regular company communication channels;
- The Ethics Committee will review the investigation materials and any new information presented;
- You will receive an answer within two weeks;
- The Ethics Committee's review is the company's final position on the matter;
- In accordance with local laws and regulations, you have the right to take the matter to external arbitration.

2.5.6 Impartiality of the Ethics Committee

If a report involves a member of the Ethics Committee, the Reporter may bypass standard reporting procedures and submit the issue directly to the CEO or another member of the Ethics Committee. A separate Investigation Team will be formed to investigate the claims without the involvement of the Ethics Committee member under question.

2.6 Communication & Timelines

Our aim is to ensure that all cases are resolved promptly and efficiently, with the understanding that no case should reasonably exceed a three-month timeframe. Timely, effective and professional communication will be maintained throughout the duration of any whistleblowing case. Communication will be conducted with sensitivity and confidentiality. Below are our guiding timelines for whistleblowing cases:

- Within 48 hours of receiving the report: first reply to the Reporter confirming that the company has received the report.
- Within 1 week: the appointed investigator contacts the Reporter for further information

- Investigation Process takes place
- Case closing: We are committed to reaching a conclusion on each case within three months from the date of case notification. In cases where an external investigator is required, it will be communicated to the Reporter and verify timelines if there is a need for adjustment.

2.7 Documentation, Data Privacy and Protection

In all investigations, we prioritise documentation, data privacy, and protection of sensitive information. Our processes align with the General Data Protection Regulation (GDPR), other applicable data privacy laws, and other relevant governing regulations to safeguard individuals' privacy rights and maintain compliance. We process the personal data of Reporters and other involved individuals in accordance with [Bolt's Employee Privacy Notice](#). Any personal data of Reporters will be retained in accordance with applicable retention periods.

3. Responsibilities

3.1 The Ethics Committee

Oversee all incoming reports through the Whistleblower system and other ethical issues in the company. Committee members are responsible for ensuring compliance with the Bolt Whistleblower Policy, guaranteeing equal response to all valid reports, and ensuring fair treatment across all cases and geographies. They also prevent conflict of interest and power centralization by involving multiple individuals in case management. Key responsibilities include appointment of investigators, determining the nature of raised reports, deciding on investigation approaches and delegating them to be handled by the appropriate investigation teams in People, Legal or Internal Audit.

Depending on the nature of the complaint, the appropriate investigators are appointed to conduct an investigation:

- In case of a report in the People domain (discrimination, harassment, sexual harassment, bullying, abuse of power) an Investigator from the People team, usually a People Partner, will be appointed.
- In case of a report of legal nature, an Investigator from the Legal team will be appointed.
- In case of a report on fraud or any instance falling under Internal Audit's remit, an Investigator from Internal Audit will be appointed.

3.2 Investigators

- Takes a lead in carrying out the Investigation process, including relevant parties necessary for a successful investigation, gathering evidence, documenting everything according to the highest standard, and leading the case to a resolution.
- As a principle, the Investigator should be impartial to the people under investigation

3.3 Reporters

Reporters are expected to:

- Comply with all applicable internal and external regulations and policies
- Maintain professional and orderly conduct, and a healthy and inclusive work environment for all
- Take appropriate action when experiencing or witnessing any type of misconduct, including reporting through the designated channels
- Cooperate with investigations, including attending interviews and providing relevant information when requested
- Respect confidentiality and refrain from discussing investigations to un-involved parties as this may jeopardize the privacy and well-being of Reporters and individuals accused of misconduct
- Support efforts to restore and maintain a healthy work environment once a case has been resolved and appropriate actions have been taken.

3.4 The Company

- Commits to upholding a high level of conduct, fostering a healthy and respectful work environment with all resources available, and creating processes, policies and guidelines which support orderly work. Checks and balances are in place to ensure that the possibility for discrimination, fraud, or exercising malicious intent are brought to a minimum.
- Commits to fostering a culture of ethics and accountability. As part of this commitment, we will provide relevant training and awareness programs for members of the Ethics Committee, Investigators, managers, and all employees. These programs equip our team with the knowledge and skills necessary to effectively navigate our Whistleblower Policy, ensuring that everyone understands their rights, responsibilities, and the importance of speaking up. By investing in training and awareness, we aim to create a workplace where integrity and transparency are valued and upheld by all as we strive to have 100% respect at Bolt.
- Reports on the number and nature of cases on a frequent basis to relevant stakeholders and institutions.

- Looks for trends in the reports that indicate systemic issues in the company and takes action to overcome them.
- Reports any issue of appropriate legal significance to the relevant authorities.

4. Policy Review

This policy is due review by the Policy Owner and Bolt Management Team on an annual basis.

▼ Review History of this Policy and Associated Documents

Classification: Internal use only						
Version	Document Owner and Approver	Document Author(s)	Document Reviewer(s)	Date Approved	Next Review	Summary of Changes
1.0	@Nicholas Walker (Deactivated) - VP of People	@Mare Heinluht - Diversity & Inclusion Manager @Andrzej Lipson - Head of Regional People Partnering CEE, South & Africa	@Vincent Pickering -General Counsel & Company Secretary @Lobke Meijen (Deactivated) - Director of Internal Audit	6 Oct 2025 - GRC Committee	6 Oct 2026	First Version