



Thoughtworks Speak Up Policy


Speaking up at Thoughtworks




How to speak up

 Talk to your functional leader, CLT or any global, regional leaders

 Send an email to compliance@thoughtworks.com

 Talk to your local People or Legal teams

 Go to integrity.thoughtworks.com (web portal or by phone) managed by an independent partner to ask a question or report your concern

Remember that giving, receiving, and responding to considerate feedback is still part of our culture. Direct actionable feedback is encouraged if appropriate given the situation or if you feel comfortable doing so. If that is not the case, you can always use one of the reporting channels above.

All reports are treated with sensitivity and respect for confidentiality. Thoughtworks has zero tolerance for retaliation against people who speak up. If you want to know more about what happens after you speak up, read our Speak Up Policy.

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Thoughtworks Speak Up Policy

What is this policy and what does it cover?

Why do we have this policy?

The purpose of this policy is to encourage you to raise concerns about actions that violate or appear to violate our Code of Conduct, our policies or the law, without fear of retaliation and consistent with our culture of integrity. We want you to know how to raise potential problems and what you can expect from Thoughtworks if you speak up.

Since this policy is about speaking up, it covers not only the reports made through the Thoughtworks' Integrity Helpline but also the reports made through the other speak up channels we have (see "[How to speak up?](#)").

Why is speaking up important?

Integrity is one of Thoughtworks' values and it means that we are committed to conducting business transparently, responsibly, and with respect for each other, society, and the law. Speaking up is one way of demonstrating our commitment to doing the right thing. Having the courage to raise our voices when something is wrong helps to nurture our culture and maintain the diverse and inclusive workplace we actively strive to build.

If you observe conduct that is not aligned with this commitment, you are strongly encouraged to report it, so we can maintain our culture of integrity and take action if needed.

Who may speak up?

This is open to all existing and former employees, officers of the company, board members and anyone else we interact with such as contractors, clients and vendors. Anyone may raise a concern about conduct that violates or appears to violate our Code of Conduct, our policies or the law. Furthermore, the company's Directors, officers or managers are expected and required to speak up and report any such concerns.

What concerns are covered by this policy?

This policy can be used to raise concerns about possible violations of our Code of Conduct, our policies or the law.

Examples of concerns that are covered by this policy are:

- Discrimination or harassment
- Improper disclosure or misappropriation of confidential or personal information
- Fraud, including fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement or in the recording or maintaining of financial records
- Bribery or corruption
- Conflicts of interest
- Insider trading
- Misuse of Thoughtworks' resources or property
- Environmental, health and safety, and human rights issues
- Misrepresentations or false statements to or by a senior officer of Thoughtworks or an accountant regarding a matter contained in financial records, financial reports or audit reports
- Inadequate financial or non-financial recordkeeping
- Deficiencies in or noncompliance with internal accounting controls
- Deviation from full and fair reporting of Thoughtworks' financial condition
- Violations of laws or regulations
- Violations of any of our (other) policies, whether global or regional
- Retaliation against anyone for speaking up in good faith

Do not use this policy:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or your country emergency phone number;
- For any complaints you may have in relation to your terms of employment (objections to your performance review, disagreements with your manager, or complaints about a salary review) unrelated to the concerns covered above. For assistance with such matters, please reach out to a Talent Business Partner;
- To settle personal or legal disputes unrelated to the concerns covered by the policy;
- To make accusations which you know are false. Doing so may lead to disciplinary measures.

Speaking up

How to speak up?

Our Speak Up policy allows you to raise concerns about actions that violate or appear to violate our Code of Conduct, our policies or the law through different channels.

If something doesn't feel right, you are encouraged to have honest conversations with the person involved. We strive to ensure our culture is open and transparent, so direct actionable feedback has always been encouraged. If this is not appropriate or you do not feel comfortable addressing it directly, you can speak to your functional leader, a member of the Client Leadership Team (CLT) or any other global or regional leader. It is part of the role of our leaders to support their team members in addressing their concerns.

You can also reach out to your local Talent Business Partner, colleagues from the People or Legal teams, or the global Compliance team. They are available to provide you guidance and support on handling the issue. They can also assist you in filing a report or file a report on your behalf.

Alternatively, you might use Thoughtworks' Integrity Helpline¹, which allows you to report your concerns anonymously if you prefer. The Integrity Helpline is operated by an independent third party and is available in multiple languages, 24/7, 365 days a year.

There are two ways to submit a report through the Thoughtworks Integrity Helpline:

- 1) Online through the dedicated web portal: integrity.thoughtworks.com; or
- 2) By phone via the Integrity line. Please check integrity.thoughtworks.com for the phone number in your country and for further instructions.

Speak Up channels:

- Your functional leader, Client Leadership Team (CLT) or any other global or regional leader
- Your regional Head of People or Talent Business Partner
- Your regional legal team
- Global compliance team by email (compliance@thoughtworks.com)
- Thoughtworks' Chief Compliance Officer (CCO) directly
- Thoughtworks' Integrity Helpline

¹ While this is a group reporting channel, local channels remain available as well through the People or Legal representatives designated [here](#). When a report affects a local entity, designated local personnel are involved in managing and addressing the report to ensure compliance with local laws and regulations.

Whether you identify yourself or raise concerns anonymously, please include as much detail as possible, so that it is easier for Thoughtworks to take appropriate actions and thoroughly investigate the situation. A report can only be investigated if it contains sufficient information and there is a reasonable possibility of obtaining further information after inquiry.

A report should, to the extent possible, contain the following information:

- Any relevant background necessary to understand the reported conduct or activity;
- The alleged event, matter or issue that is the subject of the report;
- The name of each person involved and the actions or omissions of such person in relation to the reported matter;
- If the report involves a specific event or events, the approximate date and location of each event; and
- Any additional information, documentation or other evidence available to support the report.

What about 'external whistleblowing'?

We encourage you to raise concerns internally through one of the available channels. By reporting internally, you give Thoughtworks the chance to look into the matter and take action if needed, protecting and improving our culture together.

Where available and appropriate, however, reports can also be raised to official authorities. Please find more details about external reporting in [Annex three](#). Nothing in this Speak Up Policy is intended to limit employee reporting of alleged violations of policies or applicable laws to law enforcement or proper government and regulatory authorities.

When to speak up?

If you know about or suspect misconduct, report it internally as soon as possible through one of our available channels. While it may often be better to discuss suspected misconduct or questionable actions as they arise, please report them promptly so we can avoid situations getting out of hand.

If you do not have all the facts, but you honestly believe your report may be true, then still report it with the facts you have. You are not expected to investigate the matter or to seek evidence by yourself before speaking up. Let Thoughtworks assess and investigate your concern and if necessary we will get back to you with any questions.

You should provide as many details as possible, or as much as you feel comfortable providing, so that the matter can be addressed thoroughly and efficiently. No disciplinary measures or other steps may be taken against you if your genuine concern turns out to be mistaken or misguided.

How will you be protected if you speak up?

Do reports remain confidential?

If you raise a concern under this policy we assume you are acting in good faith and doing the right thing. Your identity, if known, and any information which is likely to lead to your identification will only be shared with a limited number of people on a strict need-to-know basis. You will share information with the understanding that all reasonable steps will be taken to reduce the risk of your identity being disclosed during the course of the investigation or its resolution. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake.

In principle, we are obliged to inform the implicated person that a complaint has been filed against them and to objectively hear their perspective. Your identity, if known, will not be disclosed to the extent possible and permitted by law. You can help us protect confidentiality and maintain the integrity of any investigation by being discreet and not discussing your report with your colleagues or anyone else. Disclosure of confidential information to individuals not connected to an investigation may be viewed as a serious disciplinary offense and may result in discipline, including dismissal.

Is it possible to report anonymously?

You can share your concerns anonymously where permitted by law. We do however encourage you to reveal your identity as reporting anonymously may limit our ability to investigate thoroughly.

What about my privacy?

Thoughtworks is committed to protecting the privacy of everyone involved. We take all reasonable steps to safeguard personal data from unauthorized access and processing. Any personal data obtained as part of this Speak Up Policy will be used only for the purposes explained in this policy or to comply with the law or an important public interest, such as safeguarding or protecting the public. Please find more details on the protection of personal data in [Annex one](#).

Non-retaliation

At Thoughtworks, we encourage people to speak up about misconduct, and Thoughtworkers are always protected when they raise a concern in good faith (*i.e.* when you honestly believe your report may be true even if you do not have all the facts; see "[When to speak up?](#)"). You will not, nor will anyone assisting in the investigation of a report, face any retaliation. This means, you will not be threatened or intimidated, have your employment terminated or suspended, be disciplined, transferred, demoted, refused a promotion, have your performance of work responsibilities obstructed, or be otherwise treated negatively as a result of raising concerns.

If you feel you (or someone you know) has been subjected to retaliation or treated negatively as a result of raising concerns in good faith about suspected misconduct or assisting in an investigation, please report those actions as well. A report on retaliation against anyone who reports misconduct is treated like any other speak up report and the same investigative procedure will be followed.

All of that being said, if you maliciously or recklessly raise a concern that you know or have reason to know is false, or you are otherwise not acting in good faith, you will not be protected. Submitting a malicious or reckless report is a serious offense and will result in disciplinary action, up to and including dismissal.

What happens after you speak up?

What happens after I report something?

Thoughtworks takes every report of possible misconduct seriously. If you submit a report via the Integrity Helpline, you will receive a confirmation of receipt within seven days. The information in your report will go through an initial review to decide if it requires further investigation (and, if so, by whom and in which form). You might be approached for additional information.

If the report requires further investigation, it will be assigned to a lead investigator, chosen based on the locations of the involved parties, the nature and severity of the report, and adherence to a non-conflict principle.

If the report is related to concerns regarding questionable accounting (including internal accounting), auditing or similar matters, the Audit Committee of Thoughtworks' Board of Directors will oversee the investigation and may appoint the lead investigator. For more information on the role of the Audit Committee in the implementation of the Thoughtworks Speak Up Policy, please see [Annex two](#). If needed, outside experts (e.g., lawyers or

accountants) can be engaged to assist in the investigation and may be designated the lead investigator, by the Audit Committee or management, as needed.

Thoughtworks is committed to keeping you informed of the status of the internal investigation within a reasonable timeframe and according to local law requirements. Once the investigation is complete, you will be informed of the overall findings, whether or not Thoughtworks has established that misconduct has taken place, unless legal counsel or the Audit Committee, as the context may require, determines that there are overriding legal or company/public interest reasons not to do so. Please note that, unless required by law, we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

In the event it is determined that misconduct has taken place, a decision will be taken regarding what action is needed, such as disciplinary actions or other measures like policy changes, control improvements, or training to prevent future issues. If the misconduct indicates a violation of applicable criminal laws, the offending activity may be reported directly by Thoughtworks to local law enforcement or the relevant government or regulatory agency for further action.

How does the investigation process work?

Our investigation process will follow these guiding principles:

We will be impartial and unbiased. If you are accused of misconduct, you will be informed of the allegations in the course of the investigation and you will have an opportunity to provide your perspective on the investigation as soon as reasonably possible. Your identity as the subject of an investigation will be kept confidential to the extent possible. You must not interfere with the investigation, this includes actions that could be interpreted as withholding, destroying or tampering with evidence. We also expect you to refrain from coaching, threatening or intimidating witnesses or investigators.

We will not jump to conclusions. We will investigate all credible allegations and the decision to conduct an investigation will be guided by the policy indicated by the reported violation. An investigation doesn't mean we think you violated our Code of Conduct, our policies or the law; it means we need to engage in an objective, fact-finding process to determine whether there has been a violation.

We will conduct investigations as promptly as possible, thoroughly and objectively.

- Promptly means as quickly as possible without affecting the quality and depth of the investigation; typically this should mean that an investigation will commence within

days, not weeks, after the receipt of a report and will proceed at a reasonable pace until conclusion and within local law timeframes as applicable.

- Thoroughly means following all relevant leads to their logical conclusion and documenting all material aspects of the investigation.
- Objectively means that the investigation and questions will be unbiased, open ended and not leading. It also means that no person assisting with the investigation will have a conflict of interest (or the appearance of a conflict), considering the allegations and the parties involved. If there's a conflict, the conflicted individual will be removed from the investigation.

We will create a report and inform you of the outcome. The lead investigator will create written records of all interviews and shall maintain a record of all other relevant evidence considered as part of the investigation. An investigation team may be assembled as required to respond appropriately to the details of the report. You may be provided a summary of the outcome but not provided full details of the outcome or related actions taken for reasons of confidentiality, privacy and the legal rights of all involved, unless required by law.

What is expected of you in connection with investigations?

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Lying to the people performing the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential (except as may be required by applicable law). If your concern is well-founded (*i.e.* misconduct has taken place), appropriate measures will be taken where necessary, in accordance with applicable laws and our policies.

What to do if you have a concern about the follow-up on a report?

If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please inform the global compliance team at compliance@thoughtworks.com.

More information?

If you have questions relating to the Speak Up Policy or if you need assistance, please contact one of our Talent Business Partners, [People or Legal teams](#) or the global compliance team by emailing: compliance@thoughtworks.com. Any such person is bound by strict confidentiality requirements in relation to the assistance they provide you with and any information concerning a potential report that you intend to submit to us.

Notes

Any applicable national legislation and corresponding required local policies remain valid and where the terms of this policy are stricter than applicable legislation or local policy, the terms of this policy will prevail.

Thoughtworks will review this policy from time to time to ensure it complies with the applicable legal requirements. We reserve the right to change this policy at our discretion.

ANNEX ONE: PROTECTION OF PERSONAL DATA

This annex explains how Thoughtworks collects, uses, and shares personal data for speak up purposes. This includes any personal data relating to the person making a report, as well as personal data about those individuals against whom an allegation has been made or those who have been identified as having information about the allegation.

For more general guidance on how Thoughtworks handles your personal data please see the [Employee Privacy Notice](#), or ask for clarity from: privacyofficer@thoughtworks.com

Calls and on-line reports to the Integrity Helpline are received on behalf of Thoughtworks by an independent provider called Convercent. Convercent is based in the United States with servers located within Seattle and Dublin. Thoughtworks has taken the required organizational and contractual measures to ensure that any personal data gathered by Convercent is adequately secured and processed for authorized Integrity Helpline purposes only. Thoughtworks is the data controller of the Integrity Helpline.

Personal data

The sort of personal data Thoughtworks holds as part of the speak up process may include:

- Your name and contact details (if you decide not to report anonymously)

- The name and title of the individual(s) you may be reporting
- A description of any questionable conduct, including all relevant details
- Any questions you may have included in your report

Although Thoughtworks and the agency operating the Integrity Helpline (Convercent) do not actively seek it, sensitive personal data, as defined by privacy regulations, could be included in the speak up report.

Where you provide your name and personal contact details, your identity will be kept confidential to the extent possible and permitted by law (see "[Do reports remain confidential?](#)"). Legal or business requirements may not allow for complete anonymity, and in some cases it may not be possible to proceed with or properly conduct an investigation unless those involved reveal their identities.

Purpose of data processing

Thoughtworks may process your personal data to:

- Administer the Integrity Helpline and assess and follow-up on submissions to the Integrity Helpline
- Investigate alleged violations
- Take any necessary follow up action upon the completion of an investigation
- Create anonymous reports for Thoughtworks management

Legal basis

Thoughtworks will only process your personal data in ways compatible with the purpose for which it was collected. To the extent necessary for such purposes, Thoughtworks will take reasonable steps to make sure that personal information is accurate, complete and otherwise reliable with regard to its intended use.

With regard to a speak up process, Thoughtworks shall use your personal data in line with the [Employee Privacy Notice](#). Thoughtworks relies on legitimate interests as the lawful basis for the collection and use of your personal data.

Your personal data may be kept and used to manage the speak up process whilst you are working for us, and deleted in accordance with Thoughtworks' retention schedule.

Disclosures

Personal data collected for the purposes referred to above will be shared with Convercent who administers the Integrity Helpline on behalf of Thoughtworks.

We may also permit selected third party experts, such as forensic accountants, external lawyers or consultants, to access for the purpose of conducting internal investigations.

Furthermore, personal data collected for speak up purposes will only be disclosed to any other party if Thoughtworks is under a duty to disclose or share your personal data in order to comply with any legal obligation or when necessary to report criminal offenses.

Your rights

Any person may inquire as to whether or not a report has been filed against them. If so, they will be provided with a written overview of the personal data available about them unless this would seriously hinder the investigation. If personal data proves to be inaccurate or incomplete, the implicated person can request rectification or completion thereof. Under specific circumstances and subject to applicable local rules, an employee may request erasure of personal data concerning them or request restriction of processing of personal data concerning themselves.

For further information regarding how Thoughtworks uses your personal data, please refer to the internal [Employee Privacy Notice](#).

If you have a complaint about our handling of your personal data please email privacyofficer@thoughtworks.com. For any questions regarding any other aspect of the above policy please email compliance@thoughtworks.com.

ANNEX TWO: THE ROLE OF THE AUDIT COMMITTEE

This annex explains the role of the Audit Committee of the Thoughtworks' Board of Directors in the implementation of the Thoughtworks Speak Up Policy. In order to maintain Thoughtworks' listing on a national securities exchange, a qualified audit committee must ensure proper oversight of Thoughtworks' financial reporting and disclosure.

Thoughtworks is dedicated to conducting business with efficiency, fairness and integrity and encourages behavior that will maintain the public's confidence and trust in its operations. To help meet these expectations and pursuant to Sections 301(4)(B) and 806 of the Sarbanes-Oxley Act of 2002, the Audit Committee will oversee the investigation of all submitted reports through the Thoughtworks Speak Up Policy that relate to questionable accounting or auditing matters.

What concerns would be addressed by the Audit Committee?

Examples of concerns that fall under the purview of the Audit Committee include, but are not limited to:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement or in the recording or maintaining of financial records
- Bribery or corruption, to the extent related to accounting or auditing matters
- Misrepresentations or false statements to or by a senior officer of Thoughtworks or an accountant regarding a matter contained in financial records, financial reports or audit reports
- Inadequate financial recordkeeping
- Deficiencies in or noncompliance with internal accounting controls

What role does the Audit Committee play in the reporting process?

If you submit a report related to questionable accounting or audit matters, including related to the concerns enumerated directly above, the Audit Committee will be informed of the report and participate in the initial review to decide if the matter requires further investigation. The Chair of the Audit Committee, in his or her discretion, shall determine whether the Audit Committee shall direct an investigation of the report or otherwise address the report. If an investigation is warranted, the Audit Committee will oversee the investigation conducted by a lead investigator chosen at the discretion of the Audit Committee. This investigation may include hiring outside advisors, such as lawyers, accountants and auditors, to conduct the investigation as the lead investigator and establish procedures under the direction of the Audit Committee. Thoughtworks will provide appropriate funding, as determined by the Audit Committee, to compensate any advisor engaged by the Audit Committee.

Confidentiality/anonymity

The Audit Committee, the lead investigator, any assembled investigation team, and any other parties involved in the investigation shall maintain the anonymity or confidentiality of the person making the report, and any other participants to an investigation (and any ensuing evaluation), to the extent possible and permitted by law. Legal or business requirements may not allow for complete anonymity, and in some cases it may not be possible to proceed with or properly conduct an investigation unless those involved reveal their identities.

ANNEX THREE: LOCAL ADDENDUMS

This annex provides an overview of country-specific requirements to ensure compliance with local laws and regulations. It should be read in conjunction with the global "Speak Up" policy to ensure a comprehensive understanding of both global and local whistleblowing protocols.

Policy owner	Compliance team - compliance@thoughtworks.com
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Date of last policy review	04 October 2024