

SPEAK UP!

POLICY

speakup.infrontsports.com

infront

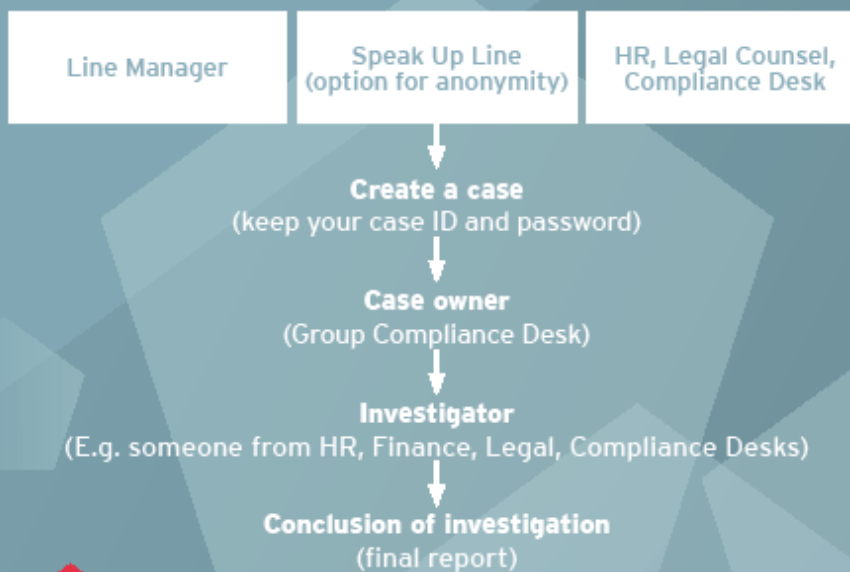
How to Speak Up

Don't sit back quietly. Speaking Up is essential for Infront to sustain our reputation, success and ability to operate - both now and especially in the future. Report your concerns, break the silence and make an impact on Infront, our industry and community.

Concerned about a misconduct?

Is this in the interest of Infront or are there personal interests?	Is this an attempt to influence someone improperly?	Is this fraud?	Are you being discriminated against or harrassed?	etc.
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Who should you talk to?



WE HAVE INTEGRITY:

- We commit to the highest ethical standards
- We are honest and take responsibility
- We show moral courage and speak up



COMPLIANCE
Integrity wins - Always

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1 Introduction

1.1 Why is Speaking Up important?

As reflected in Infront's value statement, the Infront Group ("Infront", "our company", "we", "us") is committed to conducting business on a daily basis according to the highest ethical standards and with fairness, honesty, integrity and respect. If you observe or suspect any conduct that seems to violate the law, Infront's Code of Conduct and/or its policies, guidelines and values, you are encouraged and, depending on the jurisdiction in some cases, even obliged to Speak Up. By doing so, you give Infront the opportunity to attend to the matter.

Infront values the help of employees who identify and Speak Up about their concerns and inappropriate situations. Don't be afraid to speak up, as you will not suffer because you raised a concern or suspected misconduct. Employees who Speak Up are protected and Infront has a zero-tolerance policy on any form of retaliation for Speaking Up.

After all, Speaking Up is essential for Infront to uphold its values, sustain the reputation and warrant its sustainable success and ability to operate - both now and in the future.

1.2 When to Speak Up?

Speaking Up is always required when you have concerns (weird gut feeling is already sufficient) or suspect misconduct.

Examples of misconduct may be:

Bribery, fraud, money-laundering, discrimination, bullying or sexual harassment, violations of competition law, inadequate financial or non-financial recordkeeping, conflicts of interest, environmental, health and safety issues, improper use of Infront's resources, insider trading, disclosure of confidential information, violations of Infront's policies and guidelines (i.e. gifts, entertainment and hospitality).

2 Guidance on HOW and WHEN to Speak Up

2.1 How to Speak Up?

Infront's Speak Up Policy allows you to raise concerns about suspected misconduct through various channels. Depending on the severity of the case and your need for confidentiality and anonymity, you can choose between the following options:

a) Your Line Manager

As a general guideline and if you feel comfortable with it, the first person to approach when raising a concern is your Line Manager.

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b) Compliance Desk, HR representative or legal counsel:

You may also choose to discuss your concerns with your HR representative or legal counsel who can mediate personally on your behalf. Additionally, you can always directly contact the Group or Local Compliance Desk via email, phone or in person.

For the sake of clarity, general inquiries in relation to questions and suggestions pertaining to the interpretation and directions of Infront's Code of Conduct, policies, guidelines and the applicable laws shall be addressed to the Compliance Desk.

c) Speak Up Line

As a third option you can raise your concern via the Speak Up Line, which allows you to report anonymously («speakup.infrontsports.com»). The platform is a software solution provided by an external company and enables you to fill in a form and submit any concerns by creating a case.

After you created a case (online), you will receive a case ID and password. You can use these credentials to access the website «speakup.infrontsports.com» at a later stage to check the progress on your case. In addition, you can see whether the person dealing with your case has feedback or further questions for you. If you want, you can provide additional information and/or communicate with the investigator.

Your Case ID and password are particularly important if you choose to remain anonymous, as you can only be contacted through the website for that specific case.

All cases reported via the Speak Up Line are routed back to the Infront Group Compliance Desk for further handling.

2.2 What about external whistleblowing?

By providing the different internal reporting options, by thoroughly following-up on reports and protecting those who report, we require you to raise any concerns internally, through one of the available channels. Taking a concern to an external party (e.g. the media) can have serious implications for Infront, for the persons involved and their right to a fair treatment and for yourself regarding possible liability. By Speaking Up internally, you give Infront the opportunity to investigate the matter and take further action if required. This approach allows the compliance team to ensure that similar situations do not reoccur and improve Infront overall.

2.3 What kind of information is necessary?

When you create a case via the Speak Up Line, please provide as much information as possible in order to enable the Compliance Desk to assess and investigate your concerns. This includes:

- a clear description of your concern;
- the background, history and reason for the concern;
- names, dates, places and other relevant information;
- any documents that may support the case.

We encourage you to Speak Up as soon as possible, ideally before situations get out of hand and damage is experienced. Please note that you do not need to have all the information and/or answers to all questions surrounding the case. In addition, you are not expected to prove that your concern is well founded.

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3 Safeguarding your position: confidentiality, anonymity and non-retaliation

3.1 Confidentiality

All reporting is confidential. This means that information about your concerns will only be shared with a limited number of people on a strict need-to-know basis. 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. You can assist in protecting the needed level of confidentiality by being discreet and not discussing the case with colleagues or any other parties.

3.2 Anonymity

You can share your concerns anonymously (where allowed by the laws of your country) via the Speak Up Line. We will take all possible measures to uphold your anonymity.

3.3 No retaliation - How will you be protected if you Speak Up?

Infront prohibits retaliation against any individual who Speaks Up and reports a concern or suspected misconduct.

Superiors and employees who retaliate against an individual who reported a concern regarding actual or suspected misconduct will be sanctioned.

Retaliation could, for example, appear in the form of an unjustified termination, in denying benefits, in a reassignment to less favourable tasks or positions, in making threats, etc.

In order to ensure that no employee faces any form of retaliation, a follow up on a regular basis will be organised by HR and/or the Compliance Desk. If you face or witness any retaliation, please immediately inform HR and/or the Compliance Desk or report through the Speak Up Line.

Please note that if you are implicated in the misconduct you Speak Up about, Infront will protect you from retaliation. However, note that the act of Speaking Up does not protect you from reasonable consequences of any involvement in misconduct, but, an admission is an important mitigating factor when considering disciplinary or other action.

4 What happens after you Speak Up?

4.1 What can you expect if you Speak Up?

Infront takes every report of possible misconduct seriously. If you create a case via the Speak Up Line, you will receive a confirmation of receipt latest within five (5) working days with an estimate of how long it will take to handle and assess your case. Your case will undergo an initial review, and if necessary, it will be appropriately investigated. In general, investigation of and response to the reported matter can be expected within three (3) months. You will be informed of the overall findings, i.e. whether Infront has established that misconduct has taken

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place, and the actions taken. Please note that we might not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, (data) privacy and the legal rights of all concerned parties.

4.2 Who will act on your concerns and how?

In the first phase, the Group Compliance Desk (Case Owner) will assess the case and decide if it requires further review and investigation (and, if so, by whom and in which form). You may be approached through the Speak Up Line (if a case is submitted on an anonymous basis) and/or personally for additional information.

In the second phase, if the case requires further review and investigation, the Case Owner will triage it in order to establish who should best investigate it (according to the nature of the case) and then assign it to an independent internal or external Investigator. This could, for example, be someone from Compliance, Internal Audit, HR or an external person. If the case has a risk of a severe negative impact on Infront (e.g. commercially, reputationally), the Compliance Board (only the members that are not conflicted) will be involved. Infront will ensure that only strictly necessary persons will have access to a case and that confidentiality and anonymity will be upheld.

In the third phase, the investigation will be concluded and a written report summarising the outcome and action taken will be established.

4.3 What if you are involved in an investigation?

If you become involved in an investigation, we warrant for a fair process. You will need to cooperate and answer all questions on the facts accurately and completely to the best of your knowledge. Delaying, interfering or refusing to cooperate with an investigation may result in 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, it is important to keep the matter confidential.

5 Enactment

This Speak Up! Policy was adopted by the Infront Holding AG Board of Directors on March 17, 2021 and put into force retrospectively on February 1, 2021.

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break the silence and make an impact on Infront,
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