

# Non-Retaliation and Non-Retribution Policy

Function / Department: *Ethics & Compliance*

Region: *Global*

Effective: *18 September 2018*

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# Policy Management

**Policy Sponsor:** General Counsel, Rebecca Collins  
**Policy Owner:** VP, Ethics & Compliance, Christine Brown  
**Policy Approver(s):** General Counsel, Rebecca Collins  
**Next Review Date:** 15 February 2027

## Revision History

Date	Description	Modified By	Approved By
18 September 2018	Policy released	Sepideh Moghadam	Martin Felli
19 July 2019	Minor revisions to align with Investigation Policy update	Sepideh Moghadam	
6 March 2020	Revisions to company name and links	One Hub	Sepideh Moghadam
26 February 2021	Annual Review	One Hub	Sepideh Moghadam
27 February 2022	Annual Review	Steve Roderick	
15 February 2024	Simplify purpose and align with updated Internal Reporting, Whistleblower, and Investigation Policy	Christine Brown, VP, Ethics & Compliance	Rebecca Collins, General Counsel

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# Non-Retaliation and Non-Retribution Policy

## Purpose

This Non-Retaliation and Non-Retribution policy is designed to safeguard Reporters/Whistleblowers and individuals involved in the investigative process, foster a culture of transparent internal reporting, and promote the effective management of reported concerns.

## Scope

This Policy applies to Blue Yonder Inc. its subsidiaries, and affiliates ("Blue Yonder"), and each of its officers, directors, associates, and Contingent Workers, hereinafter ("Associates").

## Policy Requirements and Responsibilities

### ***Non-Retaliation and Non-Retribution***

Blue Yonder expressly forbids and does not tolerate any form of retaliation, retribution, discrimination, or intimidation ("Retaliatory Actions") against individuals who report any actual or potential wrongdoing, as well as those who participate in the investigation process or are part of the investigative team.

Examples of Retaliatory Actions include, but are not limited to:

- Giving an Associate job duties that are less desirable than those given to others.
- Refusing to provide an Associate with opportunities for training or professional development.
- Providing an Associate with negative performance reviews that are not justified.
- Excluding or isolating an Associate from team activities.

Additionally, Associates are prohibited from taking any effort, direct or indirect, to uncover the identities of those who have reported a whistleblower complaint or have been involved in the investigative process.

If actual or attempted Retaliatory Actions are found, Blue Yonder will take appropriate measures to ensure that the work environment for the Reporter, witnesses, and investigators is not adversely impacted due to their participation in the investigation of the reported concern.

### ***Reporting and Investigation***

Associates are expected to report Retaliatory Actions or any allegation thereof to any one of the following reporting channels:

- EthicsLine: The EthicsLine allows for reports 24 hours a day, 7 days a week, via an independent third-party vendor. Such reports may be made via telephone, text (within North America), or online and can be reported anonymously where permitted by law. All reports submitted using EthicsLine are received directly by the independent third-party vendor and then routed to the appropriate person within Blue Yonder for further handling consistent with this Policy.
- Open-Door Reporting Channels: If a Blue Yonder Associate chooses not to use the EthicsLine to report an issue, they may use any one of the following Open-Door Reporting Channels:
  - the Ethics & Compliance Department

- their direct supervisor or manager
- any member of management
- the Associate Success Department
- the Internal Audit Department
- the Legal Department.

An allegation that a Retaliatory Action has been committed shall be investigated as a Compliance Issue in accordance with the Blue Yonder Internal Reporting, Whistleblower, and Investigation Policy.

## Non-Compliance

Any Associate, regardless of position or title, who violates any provision of this policy, may be subject to discipline, up to and including termination of employment, as permitted by applicable law. Contingent Worker violations may result in termination of assignment at Blue Yonder.

## Exceptions

There are no exceptions to this policy.

## Definitions

Term	Definition
Compliance Issue	Any actual or potential wrongdoing, including an actual or potential violation of law, regulation, or policy.
Contingent Worker	Within Blue Yonder, the term "Contingent Worker" means any non-employee, intern, or apprentice who needs systems access to perform services for Blue Yonder.
Reporter / Whistleblower	The person who raises a Compliance Issue either through the EthicsLine or an Open-Door reporting channel.

## Reference

- [Internal Reporting, Whistleblower, and Investigation Policy](#)
- [Code of Conduct](#)