

DAWN RAID POLICY

This policy is concerned with Dawn Raids – **unannounced inspections by regulatory authorities** (e.g., the Office for the Protection of Competition and Consumer Protection, the European Commission), where a search warrant or subpoena allows them to search our premises and seize documents, devices, and/or other evidence that may be relevant to an investigation of alleged illegal conduct.

This policy sets out clear procedures on how to act in such situations, with the aim of protecting both the company and individual employees.

Key points for employees include:

- You may communicate with them **only after** they have presented their official identification or authorization
- You must cooperate with authorities, including providing passwords needed to access secure documents. Failure to cooperate with an investigation may constitute a criminal offense.
- You must not remove, alter, or destroy any documents.
- Discussing the search internally or externally is prohibited.
- You must follow any additional instructions provided by legal counsel and/or management.

If agents request to speak with employees:

- Remind employees that if they speak to agents, they must be honest and respond briefly and to the point.
- You must provide agents with explanations of the facts and documents related to the reason and purpose of the search.
- You may refuse to answer if such an answer would be a direct or indirect admission of any wrongdoing. Employees shall always answer all factual questions. Employees may also offer explanations in writing. If the employee is unsure, always contact a lawyer.

Key takeaways:

Do not obstruct the Agents or hinder the search in any way.

Always inform the most senior leader available on site and contact Elevion legal counsel.

Cooperate with the Agents, however without any obligation of self-incrimination or admitting to any misconduct.