

CEVA GROUP

ALERT SYSTEM

| Title: Alert System | DOCUMENT REVISION # | DOCUMENT REVISION DATE | EFFECTIVE DATE |
|---|----------------------------|----------------------------------|--------------------------------|
| By: Ethics and Compliance Department | 1 | December 21 st , 2017 | January 1 st , 2018 |





Overview

The Alert System has been established so that all cases of suspected misconduct are reported and responded to in a timely and appropriate manner by:

- Enabling you to **speak up in confidence** and report matters;
- Encouraging **identification of all improper, unethical or inappropriate behavior** at all levels of the organization;
- Providing assurance that all reports will be taken seriously, **treated as confidential** and managed without fear of retaliation.

The Alert System is a **supplementary process** through which an employee may raise concerns if that employee is uncomfortable with using normal business channels or with the answers he has received from them.

The use of the Alert System is **entirely optional** and voluntary and there will be no consequences for employees who report misconduct outside of the Alert System.

> Who Can use the Alert System?

The Alert System is available to **everyone working for or on behalf of the Group**. It is also open to **any party to whom our Group has or has had some type of business relationship** (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers), or any other third parties, who wish to raise a concern about possible misconduct within the Group.

> What Concerns are Covered by the Alert System?

The Alert System can be used to raise concerns about suspected misconduct, that is, **any violation of the law, our Code or policies** under which our Group operates, whether this suspected violation is happening now, took place in the past or is likely to happen in the future.

> How to use the Alert System?

Act in Good Faith

Users of the Alert System must **act in good faith** and must not make deliberately false allegations when reporting a matter. Act in good faith is when a report is made without malice or consideration of personal benefit, and the reporting party has a reasonable basis to believe the allegation to be true.

Any individual who deliberately makes false or misleading statements that are not in good faith may be subject to disciplinary action or appropriate legal action pursuant to applicable laws and regulations. Any individual who makes statements in good faith will not be subject to retaliation if the statements are later shown to be inaccurate.

Access to the Online Alert System

You can access the Alert System at the following **web address** www.ceva.com/en/Who-are-we/Alert-System and will be required to fill in a report form to submit your concern. This form gives you the opportunity to raise



concerns confidentially and in your own language. The Alert System is managed by the Ethics and Compliance Department.

Provide Information About Your Concern

You can share your concerns anonymously (where permitted by applicable law(s)). We do however encourage you to **reveal your identity** as it is difficult and in some cases impossible for us to fully investigate reports that are made anonymously.

When you file a report, please **provide as much detailed information as requested in the form** as you have to enable us to understand and investigate your concern. We do not expect you to have all the answers and you are not expected to prove that your concern is well founded. Let the Ethics and Compliance Department look into the matter to determine if there is a reason for concern.

Follow-up on Your Concern

Submission of Your Concern

Our Group takes every report of possible misconduct seriously. If you submit a report, you will receive **confirmation of its receipt as well as relevant information regarding timing of the review process** (the “1st Follow-Up”).

Initial Review of Your Concern

All concerns will be received by an Ethics and Compliance Officer. Your report will undergo an initial review by the Ethics and Compliance Officer. If the initial concern is actionable, you will be notified that the Ethics and Compliance Department is reviewing the matter or has referred the matter to another Group Department (the 2nd Follow-Up). If there is insufficient information in your report to determine whether or not your reported concern is actionable, a member of the Ethics and Compliance Department will, if you have chosen to identify yourself in your report, contact you to request further information.

Investigations and Corrective Action

The Ethics and Compliance Department will handle misconduct reports, along with the cooperation of other members of the Group or external advisors, as appropriate, and **will take appropriate investigative and corrective actions**. When appropriate, investigative and corrective actions have been taken, you will be **informed of the matter's closure**, as well as any additional information that is appropriate to convey (3rd Follow-Up). Please note that 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. It is not possible to set a specific timeframe for completion of investigations in advance given the diverse nature and scope of misconduct reports.

Corrective action, to the extent deemed appropriate, will be taken upon completion of the investigation of each report. Any person found to be involved in any wrongdoing may be subject to **local disciplinary procedures** (in the case of employees) or **contract termination** (in the case of business partners, suppliers, shareholders, agents, distributors, representatives and/or customers). Such remedial action may also include updates and changes to Ceva Group policies and procedures that directly address such issues,



additional trainings, policy reminder campaigns, or other corrective action. Where it is believed that a criminal activity has taken place, the matter may be reported to the police and appropriate legal action taken.



Please refer to the Alert System flowchart attached hereto for a visual depiction of the report follow-up.



Confidentiality

All **reporting is done confidentially**. This means that information about your concern will only be shared with a limited number of people, on a need to know basis (i.e to the investigation team in order to conduct proper investigations). Your identity will not be disclosed to any person identified in your report or other individuals without your permission, unless required under applicable laws and regulations; confidentiality will not attach to a report filed in bad faith. Confidentiality obligations will extend to all persons participating in the investigation process.



Protection from Retaliation

Retaliation by any employee of the Group, and or by the Group itself, directly or indirectly, against a person who, in good faith, submits a concern or provides assistance to those responsible for investigating the allegations **will not be tolerated**. If a reporting party believes that they are being treated unfairly by any person within the Group as a result of their reporting a concern, he or she should inform the Ethics and Compliance Department. Employees found to have engaged in retaliatory behavior may be subject to discipline under applicable law, up to and including termination of employment.



Records Management, Rights of Access to Information, Data Protection, CNIL authorization

Information provided in connection with a reported concern that is deemed to be unfounded or immaterial, will be destroyed.

Information provided in connection with a reported concern in relation to which misconduct has been identified will be retained for a period in accordance with applicable laws.

In line with any applicable national laws, the implicated person has the right to access the data that concerns him or her and to request that such data be corrected or deleted, as applicable. An implicated person may not obtain information regarding third parties, such as the identity of the person who submitted the report, on the basis of such rights of access.

The Alert System realizing processing of personal data has been subject to an application for authorization to the CNIL.



Contacts

For questions about this Reporting Policy or to report misconduct please contact the Ethics and Compliance Department:

Ceva Group Ethics and Compliance Department

Email: reportingcompliance@ceva.com

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Alert System Flowchart

