

MINOVA WHISTLEBLOWING POLICY

VERSION 1.0

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www.minovaglobal.com



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I. Purpose of the Policy

Minova Group (Minova or We) is committed to its values: courage, passion, performance and teamwork. We want to conduct our business with integrity and we expect all employees acting in Minova's name to maintain high standards and to uphold the values in line with our Code of Conduct. Minova encourages speaking-up and reporting conduct that does not reflect these values, align to our Code or which may be unlawful. The purpose of this Policy is to:

- ▶ Encourage the reporting of any form of inappropriate behaviours described in this Policy,
- ▶ Provide guidance on how to raise concerns,
- ▶ Confirm that confidentiality will be maintained,
- ▶ Assure that genuine concerns reported honestly can be raised without the fear of retaliation.

This Policy explains who an Eligible Reporter is, what types of matters are reportable, who is authorised to receive reports, how Minova will respond and protect whistleblowers, and the protections available to whistleblowers under the applicable laws. It also outlines Minova's commitment to encouraging speaking-up and protecting those who report.

Minova utilise Whistleblower Software channel to receive reports, which can be accessed under this link:

<https://whistleblowersoftware.com/secure/9984ba21-d03b-4b14-b8a2-45608c8f9497/channel-select>

or by scanning this QR code:



First step to use the tool is to choose Minova's entity that report concerns, this will lead you to the dedicated reporting page.

It allows to file the report in the written form or by recording an audio file which will be subject to transcription. Reporter will be granted case number and password which will allow for follow up conversation.

II. Legal basis

2.1. Legal basis – General

We have designed this Whistleblower Policy (Policy) in compliance with laws and regulations, applicable to Minova (e.g., the Australian Corporations Act 2001 (Corporations Act), EU Directive 2019/1937 on the protection of persons who report breaches of Union law, UK Public Interest Disclosure Act 1998) as well as international standards and good practices.

2.2. Legal basis – EU Entities with 50+ employees

European entities within Minova Group which employs more than 50 employees need to comply with local whistleblowers laws, which are implemented in line with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

According to EU law, such entities must implement their own policies, however they shall adhere to this Policy to the extent that does not contradict national laws and local Whistleblowing Policy as well as utilise the secure whistleblower channel which is implemented for the whole Minova Group (Whistleblower Software).

III. Qualifying for Protection as a Whistleblower

An individual will qualify for protection as a whistleblower under this Policy and applicable laws if they are:

- (1) an Eligible Reporter,
- (2) who is communicating a Reportable Matter,
- (3) to an Authorised Recipient.

These three elements are explained in detail in this Policy and must be met for protection to apply under this Policy.

Any Eligible Reporter with information about potential misconduct is encouraged to speak up and make a report in accordance with this Policy.

IV. Application of this Policy (Eligible Reporters)

4.1. Application of this Policy (Eligible Reporters) – General

This Policy applies to everyone working at Minova. Eligible Reporter can be current employees (any form of employment, including temporary employees or interns), officers and directors, who reports information on breaches set out in this Policy acquired in the context of work-related activities.

This Policy must be considered in conjunction with the laws of any country in which Minova operates. If anything in this Policy is inconsistent with any law of any country in which Minova operates, that legal obligation will prevail over this Policy to the extent of the inconsistency.

4.2. Application of this Policy (Eligible Reporters) – Australia

For Minova Australia Pty. this Policy applies to Eligible Reporter meaning:

- (a) an officer/director or employee (e.g., current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers, and directors);
- (b) **a supplier of services or goods to the entity (whether paid or unpaid), including their employees (e.g., current and former contractors, consultants, service providers and business partners);**
- (c) an associate of the entity; and
- (d) a relative, dependant or spouse of an individual in (a)– (c) (e.g., relatives, dependants or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners).

4.3. Application of this Policy (Eligible Reporters) – EU Entities with 50+ employees

In regards of reporting concerns in relation to EU entities with 50+ this Policy applies to Eligible Reporter meaning:

- (a) workers, including persons having self-employed status;
- (b) workers working on the basis of civil contract;
- (c) shareholders and persons belonging to the administrative, management or supervisory body;
- (d) volunteers and paid or unpaid trainees;
- (e) **any persons working under the supervision and direction for contractors, subcontractors, suppliers.**

It also applies to reporting persons where they report on breaches acquired:

- in a work-based relationship which has since ended,
- when work-based relationship is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations.

V. REPORTABLE (DISCLOSABLE) MATTERS

5.1. Reportable (Disclosable) Matters – General

Minova encourages individuals to report anything that they have reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances (including tax affairs) in relation to Minova (Reportable Matters). “Reasonable grounds to suspect” is based on objective reasonableness of the reasons for the suspicion. In practice, a mere allegation with no supporting information is unlikely to reach that standard.

Reportable Matters for all Minova’s entities are:

(i) breach of Code of Conduct including, but not limited to:

- fraud, theft,
- bribery and corruption,
- violation of any applicable antitrust and competition law rules,
- conflicts of interest provisions,
- breaches of data privacy or confidentiality,
- failure to comply with any legal obligation, including trade controls,
- human rights abuse;

(ii) practices or behaviours amounting to non-compliance with policies, standards, procedures or the law (i.e., including anything that may be illegal);

(iii) issues relating to the security of our products;

(iv) endangerment of an individual’s or individuals’ health and safety;

(v) endangerment of the environment;

(vi) criminal offence.

Generally, reports that concern personal work-related grievances do not qualify for protection under this Policy or applicable laws.

Personal work-related grievances are those relating to employment that have a personal implication. Examples include:

- a disagreement with another employee,
- a decision relating to an individual’s employment or engagement (such as a transfer, promotion or disciplinary action).

Personal work-related grievances should be reported to the person’s Line Manager or Minova’s Human Resources team. In some cases, these grievances may qualify for legal protection.

Individuals who report a matter can still qualify for protection even if their disclosure turns out to be incorrect. However, an Eligible Reporter must not make a report that they know is not true. This may be a breach of the Code of Conduct and will be considered a serious matter.

5.2. Reportable (Disclosable) Matters – Australia

Reportable Matters for the purpose of legal protections under the Australian Whistleblower laws include (but are not limited to) information about conduct that:

(i) constitutes an offence against, or a contravention of, the Corporations Act or the Australian Securities and Investment Commission Act 2001 (Cth);

(ii) constitutes an offence against any other Australian Commonwealth law that is punishable by imprisonment for a period of 12 months or more; or

(iii) represents a danger to the public or financial system.

(iv) Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Minova or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of Minova or an associate.

Attachment 1 lists the specific matters which are considered 'Protected Disclosures' for the purpose of protections under such laws.

5.3. Reportable (Disclosable) Matters – EU Entities with 50+ employees

Reportable Matters for EU Entities with 50+ employees include:

a) breaches falling within the scope of the Union acts that concern the following areas:

(i) public procurement;

(ii) financial services, products and markets, and prevention of money laundering and terrorist financing;

(iii) product safety and compliance;

(iv) transport safety;

(v) protection of the environment;

(vi) radiation protection and nuclear safety;

(vii) food and feed safety, animal health and welfare;

(viii) public health;

(ix) consumer protection;

(x) protection of privacy and personal data, and security of network and information systems;

(b) breaches affecting the financial interests of the Union as referred to in Article 325 TFEU and as further specified in relevant Union measures;

(c) breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.

Eligible reporter will qualify for protection under local law if the reportable matter concerns public interest, is true at the moment of reporting and concerns breaching the law.

VI. REPORTING A MATTER TO AN AUTHORISED RECIPIENT

6.1. Reporting a Matter to an Authorised Recipient – General

To identify and address wrongdoing as early as possible We encourage people who wish to raise a Reportable Matter that qualifies for the whistleblower protections to do so to Authorised Recipients, which for all matters are members of Minova's Legal Department.

Reports must be made through Minova's Whistleblower Software channel. This channel is available in multiple languages, at any time of the day or night and allows to report the matter as a written report or voice recording.

All data in Whistleblower Software is encrypted and only Authorized Recipients or other authorized persons (e.g., internal: Human Resources, CFO, company's officers or directors, external: attorneys or auditors, who help with investigating reports) will get the access to data.

You may also report concerns to applicable external authorities as permitted within local jurisdiction. Minova advises to seek advice before reporting a concern to anyone external. Your local legislation may set out the bodies to which qualifying disclosures may be made.

6.2. Reporting a Matter to an Authorised Recipient – Australia

For the reports concerning Minova Australia Pty the following Australian regulators are also Authorised Recipients for reports under this Policy:

- (i) Australian Securities and Investments Commission (ASIC) – www.asic.gov.au
- (ii) Australian Prudential Regulation Authority (APRA) – www.apra.gov.au
- (iii) If the report relates to Minova's tax affairs, the Commissioner of Taxation – www.ato.gov.au

In certain circumstances, Eligible Reporters may also be protected if they report a Reportable Matter that they consider is in the 'public interest' (a 'Public Interest Disclosure') to a professional journalist or parliamentarian. There are specific legal requirements which must be met in order to receive protection in such circumstances. It is recommended that individuals seek independent legal advice before making a Public Interest Disclosure.

Please see details in terms of Eligible Reporters and Reportable Matters in the Attachment 1.

6.3. Reporting a Matter to an Authorised Recipient – EU Entities with 50+ employees

General rules apply in terms of receiving reports made using Whistleblower Software channel (Minova's Legal Department will receive the reports).

However, internal reports must be **handled** by Authorized Recipients within each legal entity. Designated persons can be assisted in investigating and following up the reports by outside persons, including Minova's Group: Legal Department, Human Resources, CFO, when appropriate authorizations and agreements are in place.

Eligible Reporters may also be protected if they report Reportable Matter outside to the recipients as indicated in local laws.

Process of handling reports and outside reporting is further explained in local, supplementary Whistleblowing Policies.

VII. Protection for Whistleblowers

Minova is committed to ensuring that anyone can raise a concern freely, without fear of reprisal or intimidation, and that any concerns are dealt with fairly, thoroughly, confidentially and in a timely manner.

The protections do not grant immunity for any misconduct a whistleblower has engaged in that is revealed in their disclosure.

7.1. Protecting a Whistleblower's Identity – General

Minova will protect the identity of people who report concerns under this Policy.

Specific measures include that:

- ▶ all paper and electronic documents and other materials relating to reports are stored securely;
- ▶ whenever possible, communication around the case is handled in Whistleblower Software channel, meaning it's securely stored and encrypted;
- ▶ access to all information relating to a report is limited to those directly involved in managing and investigating the report;
- ▶ only a restricted number of people who are directly involved in handling and investigating a report are made aware of an Eligible Reporter's identity or information that is likely to lead to the identification of the Eligible Reporter; and
- ▶ each person who is involved in handling and investigating a report is reminded about the confidentiality requirements, including that an unauthorised disclosure of an Eligible Reporter's identity may be a criminal offence.

It is illegal for a person to identify an Eligible Reporter or disclose information that is likely to lead to the identification of the Eligible Reporter, outside a limited set of circumstances. A person's identity (and any information Minova has, because of the report, that could be used to work out an identity) will only be disclosed if consent to disclose that information is provided or, an exceptional circumstance, where the disclosure is required by law (e.g., in dealings with a regulator).

The information contained in a reported matter can be disclosed with or without the consent of the Eligible Reporter only if the information does not include the Eligible Reporter's identity, Minova has taken all reasonable steps to reduce the risk that the Eligible Reporter will be identified from the information, and it is reasonably necessary for investigating the issues raised in the report.

7.2 Anonymity – Australia & United Kingdom

Eligible Reporter who reports suspicion of misconduct in regards of: Minova Australia Pty or Minova's entities incorporated under the laws of United Kingdom may choose to remain anonymous when reporting through the Whistleblower Software channel.

Eligible Reporter can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

If an Eligible Reporter in regards of Minova Australia Pty has any concerns that their identity has not been appropriately protected, they can lodge a complaint with the Compliance Manager via email.

Alternatively, a complaint may be lodged with ASIC (Australian Securities and Investments Commission), APRA (Australian Prudential Regulation Authority) or the ATO (Australian Taxation Office).

7.3 Protection from Detriment

No person may cause detriment to someone else, or threaten detriment, because they believe the person has made or will make a report.

Examples of detriment include:

- discrimination,
- harassment,
- causing physical or psychological harm,
- damaging property,
- varying an employee's role or duties,
- refusal of employment, or failure to conduct a fixed-term employment contract or an indefinite-term employment contract if the employee had a legitimate expectation that such a contract would be concluded with him,
- termination or termination without notice of employment,
- reduction of remuneration,
- withholding of promotion or omission from promotion,
- omission from the award of work-related benefits other than salary, or reduction in the amount of such benefits,
- suspension from work or official duties,
- unfavourable change in the place of work or work schedule,
- negative evaluation of work performance or negative opinion of work,
- imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature,
- coercion, intimidation or exclusion,
- unfavourable or unjust treatment,

- withholding of participation or omission in typing for participation in professional qualification training,
 - unjustified referral for medical examination,
 - action aimed at making it difficult to find future employment in a particular sector or industry on the basis of an informal or formal sector or industry agreement,
 - causing financial loss, including economic loss or loss of income,
 - causing other intangible damage, including damage to personal property, in particular to the applicant's good name,
- or threat or attempt of any of such detriment.

Managing a Whistleblower's unsatisfactory work performance, if the action is in line with the Minova's performance management framework does not constitute detrimental conduct.

Any person involved in detrimental conduct will be subject to disciplinary action. In some circumstances and under some jurisdictions, this may also be a criminal offence punishable by imprisonment.

7.4 Other Protections Available

Depending on the information reported and the circumstances, other protections may also be appropriate including:

- (i) monitoring and managing the behaviour of other employees,
- (ii) offering flexible workplace arrangements while a matter is investigated,
- (iii) rectifying detriment that you have suffered.

Depending on location, a range of specific protections and remedies may be available to whistleblowers. These are explained in Attachment 1 below as well as local, supplementing Whistleblowing Policies when applicable.

VIII. Handling and Investigating a Reported Matter

8.1 Handling and Investigating a Reported Matter – General

If you report a concern, action will be taken to investigate and address the situation. Depending on the nature of the report, the concern may be investigated by an authorised persons within Minova or with assistance of external provider.

In all instances we will comply with any applicable laws, ensuring that:

- ▶ Investigations are thorough and completed in a timely manner.
- ▶ We act impartially and with objectivity.

- ▶ We respect confidentiality and privacy.
- ▶ People reporting concerns are protected from reprisal.

We will review all reports in a timely manner, will determine whether the report requires investigation and, if so, which area of the business should be responsible for leading the investigation.

To ensure independence and absence of conflict of interest, reports may be received by Legal Department. Reports may be handled by Legal Department with assistance of Heads of Human Resources, Chief Financial Officer and members of the Boards of Directors of concerned entities, as well as outside assistants (e.g., attorneys, auditors). Any need of appointing any other persons within or outside the Minova Group will be carefully assessed and requires granting authorization.

Where a report is subject to an investigation, set steps will be followed:

- (i) The confirmation of receipt of report **within 7 days** of its receipt will be send to the Eligible Reporter, unless it is not possible to contact him or her,
- (ii) The follow-up actions will be taken with adequate due diligence,
- (iii) Investigations will be completed as fairly and promptly as possible by an authorised, impartial investigator who is independent of the business area concerned and any person who is the subject of the reportable conduct. All employees and contractors must cooperate fully with any investigations.
- (iv) Where a person is being investigated, the details of the report involving them will be communicated to them (to the extent permitted by law) and they will be provided an opportunity to respond.
- (v) Where the Eligible Reporter can be contacted, they will be provided with updates throughout the investigation process. If reports were sent via Whistleblower Software channel, updates will be received therein.

The maximum time limit for providing feedback to the Eligible Reporter is **3 months from the acknowledgment of receipt of the report**.

- (vi) When the investigation is completed, findings and any associated recommendations will be documented in a formal report to management of the relevant business area, HR and to the Minova's Senior Leadership Team. The implementation of any recommendations must be approved by senior management. The Eligible Reporter will be separately informed of the outcome of the investigation and of any measures taken by Minova to prevent similar issues arising in future in accordance with applicable privacy and confidentiality requirements.

The investigation process is designed to allow the fair treatment of the Eligible Reporter and Minova's employees who are mentioned in a report. In addition to the steps set out above, this includes:

- ▶ handling information confidentially,
- ▶ conducting the investigation with a presumption of innocence,
- ▶ determining whether the evidence substantiates the reported matters.

8.2 Handling and Investigating a Reported Matter – EU Entities with 50+ employees

In regards of EU Entities with 50+ employees reports may only be handled by local function. Designated persons can be assisted in investigating and following up the reports by outside persons,

including Minova's Group: Legal Department, Human Resources, CFO, when appropriate authorizations and agreements are in place.

Besides reporting via Whistleblower Software, on Eligible Reporter's request reporting can be done at the in person meeting, which shall be scheduled within 14 days from the request.

Further details in regards of handling and investigating a reported matter are set in the local, supplementing Whistleblowing Policies.

IX. Sources of Advice and Information

People considering whether to report can obtain advice about this Policy and the protections available for whistleblowers from Minova's Compliance Manager and HR. This includes information about:

- ▶ practical steps that Minova can take to protect them from retaliation,
- ▶ escalating their concerns if they have not been responded to in accordance with this Policy or where retaliation or detriment has occurred,
- ▶ how whistleblowers can access more information about protections that are available under this Policy and the law.

X. Breach of these Principles and this Policy

A breach of this Policy is considered a breach of the Minova Code of Conduct, and may have serious consequences, including termination of employment, engagement or services. Legal consequences in the form of civil and criminal penalties could also result.

Any employee who in any way retaliates against a whistleblower for making a report under this Policy will be subject to disciplinary action (up to and including termination of employment), such action can also lead to further legal consequences in the form of civil and criminal penalties.

XI. Further Information & Update of Policy

This Policy is available on the Minova website and on the Minova Hub for Minova staff. It shall be the responsibility of the Legal Department to keep this Policy up to date at all times and in line with applicable legislation. This Policy should be reviewed and updated on regular basis, at least every other year or earlier if the relevant change in law applies.

ATTACHMENT 1

1. Information on Protections Provided by Law - Australia

This attachment explains how the law enables you to also make a protected disclosure in other ways, that still entitle you to legal protection.

PROTECTED DISCLOSURES Specific types of information that is disclosed to certain people or organisations is protected by law. Examples of this information and recipients are outlined in the following table:

Information reported or disclosed	Recipient of disclosed information
<p>Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to Minova Australia Pty or related body corporate. This includes information that Minova Australia Pty or any officer or employee of it or a related body corporate has engaged in conduct that:</p> <ul style="list-style-type: none"> - Contravenes or constitutes an offence against certain legislation (e.g., the Corporations Act), - represent a danger to the public or the financial system, or - constitutes an offence against any law of the Commonwealth of Australia that is punishable by imprisonment for 12 months or more 	<ul style="list-style-type: none"> - A person authorized by Minova Australia Pty to receive protected disclosures – i.e., Recipients under this Policy, - An officer or senior manager, - An auditor, or a member of an audit team conducting an audit, of Minova or a related body corporate, - An actuary of Minova Australia Pty or a related body corporate, - ASIC (Australian Securities and Investments Commission) or APRA (Australian Prudential Regulation Authority), - A legal practitioner for the purpose of obtaining legal advice or legal representation
<p>Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Minova or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of Minova Australia Pty or an associate.</p>	<ul style="list-style-type: none"> - An auditor, or a member of an audit team conducting an audit, of Minova Australia Pty or related body corporate, - A registered tax agent or BAS (Business Activity Statement) agent who provides tax services or BAS services to Minova Australia Pty or related body corporate, - A director, secretary or senior manager, - An employee or officer of Minova Australia Pty or related body corporate who has functions or duties that relate to the tax affairs of Minova Australia Pty or related body corporate.
<p>Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to Minova Australia Pty.</p>	<p>Commissioner of Taxation.</p>

The Australian whistleblower laws also protect certain disclosures made in “emergency” and “public interest” situations, in which case disclosures can be made to additional recipients following a special process under the law (including members of parliament and professional journalists).

2. Personal Work-related Grievances - Australia

Legal protection for disclosures that are solely about personal employment related matters may only be available under the applicable law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary it:

- concerns detriment to a person because they have, or are considering, making a report; or
- is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the applicable law, a grievance is not a personal work-related grievance if it:

- has significant implications for an entity regulated under the law that does not relate to the whistleblower;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct that represents a danger to the public or financial system; or
- concerns conduct prescribed by the regulations.

3. Specific Protections and Remedies - Australia

Additional legislative protections may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- reinstatement of a position if the detrimental conduct wholly or partly resulted in the termination of an employee's employment; or
- any other order the court thinks appropriate.

The law also states that if you make a protected disclosure:

- in some circumstances (e.g. if the disclosure has been made to a regulator) the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- you are not subject to any civil, criminal or administrative liability for making the disclosure; and no contractual or other remedy may be enforced or exercised against you on the basis of the disclosure.