



DUOMED

POLICY

WHISTLEBLOWER



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1. INTRODUCTION

Duomed is committed to conducting its business with honesty and integrity at all times. It is the company's policy to ensure that when a person has reasonable grounds to believe that an employee, manager or any other person related to the company has committed, or is about to commit, an act that could harm the company's business or reputation, it takes appropriate action.

This policy has been put in place to:

- Encourage employees, partners or managers to disclose this information or behaviour;
- Protect complainants from retaliation;
- Treat all parties to an investigation in a fair and equitable manner;
- To ensure confidentiality as much as possible;
- Take corrective and disciplinary action.

2. PURPOSE

The purpose of this Whistleblowing Policy is to encourage current and former employees, contractual third parties or partners to communicate events that raise serious concerns about Duomed. We will support staff who report illegal practices or individuals who violate our policies.

3. SCOPE

This policy applies to all employees of Duomed as well as contractual third parties or partners doing business with the company.

4. DUTY TO REPORT MISCONDUCT

It is the duty of all employees, contractual third parties or partners to report misconduct or suspected misconduct, including fraud and financial impropriety to the board. This includes misconducts such as, but not limited to:

- Providing false or misleading information, or withholding material information on financial statements, accounting, auditing or other financial reporting fraud or misrepresentation;
- Sharing confidential company information about Duomed;
- Pursuit of material benefit or advantage in violation of Duomed's Conflict of Interest Policy;
- Serious breach of Duomed's Health & Safety Policy;
- Misappropriation or misuse of Duomed resources such as funds, supplies or other assets;
- Unauthorized alteration or manipulation of computer files;
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of applicable laws or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal, provincial or state law or regulations;
- Unethical business conduct in violation of any Duomed policies and/or Duomed Code of Conduct;
- Danger to the health, safety, or well-being of employees and/or the public;
- Forgery or alteration of documents;
- Entering into agreements with competitors to fix prices;
- Obtaining an unlawful private benefit (i.e., Duomed assets being used by anyone in the organisation improperly for personal gain).

5. ACTING IN GOOD FAITH

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed indicates wrongdoing.

No employee, third party contractor or partner who makes a notification in good faith will be subject to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an event or action. Anyone who retaliates against a person who has made a report in good faith is subject to disciplinary action up to and including dismissal.

However, making allegations that are deemed unfounded and malicious or knowingly false may result in disciplinary action up to and including termination of employment.

6. PROCEDURE

In order to facilitate the reporting, to protect the identity of the reporter and to ensure that reported concerns are appropriately addressed, Duomed outsourced its reporting process to SpeakUp, a third-party provider that offers a reporting platform.

6.1 How to raise a concern?

The Duomed SpeakUp Line allows you to anonymously report a concern in your own language through the website <https://duomed.speakup.report/raiseyourconcern> or by downloading the App ('SpeakUp | Listen for a change' - access code 111677). By using the SpeakUp platform, a case number will be provided that you can use to create a password to access your report account. The account allows you to answer follow-up questions while staying anonymous and check the status of your concern. The Duomed SpeakUp Line is compliant with the General Data Protection Regulation (GDPR), ensuring the protection of user data and privacy.



6.2 What information to provide?

The report must contain the following information:

- A description of the incident;
- The date on which the incident occurred;
- The country where the incident occurred;
- The name of the person involved in the incident.

6.3 What happens after you have reported a concern?

After raising a concern, a (translated) report of your concern will be sent to Duomed's Ethics Committee to ensure rapid follow-up.

Ethics Committee

General Counsel

Area Director North & Central Europe

Chief Operating Officer

All complaints will be treated in a confidential and sensitive manner. Reporters will receive confirmation of receipt of the report within seven (7) days. All valid complaints will be thoroughly investigated, and steps to address any violation will be taken. Within a period of three (3) months after the confirmation of receipt, the reporter will be provided with feedback on the investigation.

The follow-up, investigation and feedback of the accepted cases will be entrusted to the competent person/body within Duomed. In some cases, this may involve an investigation by a legal adviser or an accountant. The complainant must be able to remain anonymous, except in cases where the nature of the disclosure and/or resulting investigation makes it necessary to disclose their identity (e. g. investigations or judicial proceedings). In such cases, all reasonable measures must be taken to protect the complainant from any prejudice resulting from a disclosure.

The reporting party will be kept informed of the status of the investigation; however, no substantive questions about the investigation will be answered. The investigating body may request additional information from the complainant through the SpeakUp platform. All questions can be answered anonymously. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the reporter and their supervisor. The party being reported will be informed of the investigation unless doing so would compromise the investigation. Of course, the identity of the party reporting will be kept confidential.

7. REVIEW AND UPDATE

This Whistleblowing Policy will be regularly reviewed and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations. Any changes to this policy will be communicated promptly to all relevant parties.

8. LEGISLATION AND GUIDELINES

NL Whistleblower Act (Wet Huis voor klokkenluiders) 2016

BE Whistleblower Act (Klokkenluidersregeling) 2023

FR Sapin II Law (Loi Sapin II) 2016

FR Whistleblower Protection Act (Loi No. 2022-401) 2022

SB Law on Whistleblower Protection (Zakon o zaštiti uzbunjivača) 2014

UK Public Interest Disclosure Act (PIDA) 1998

SL Law on Integrity and Prevention of Corruption (ZIntPK) 2010

SE Whistleblower Act (Lag om visselblåsning) 2017

DK Whistleblower Protection Act (Lov om beskyttelse af whistleblowere) 2021

LU Whistleblower Act (Loi du 16 mai 2023 portant transposition de la directive (UE) 2019/1937) 2023

General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) 2016