

Document name: Medicover Whistleblower Policy	Document type: Group Policy	Version: 1.0
Approved by: Board of Directors of Medicover AB (publ)	Document owner: Group HR Director	Date of approval: 28.11.2018



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## 1 Introduction

The Medicover group (Medicover AB (publ) and its subsidiaries) (“**Medicover**” or “**Medicover company**”) is committed to operating its business in the way outlined in the Medicover Code of Conduct (the “**Code of Conduct**”). To manage risks and ensure that each Medicover company in a fast and firm way can act wherever there is a suspected serious breach of the Code of Conduct and other Medicover policies, and/or local law and regulations committed by a person holding a key position or a leading position, Medicover has established a whistleblower function.

## 2 Purpose of this Medicover Whistleblower Policy

The purpose of this Medicover Whistleblower Policy (this “**Policy**”) is to encourage all employees (as defined below), to report, without having to fear or risk any subsequent victimisation, discrimination or disadvantage, their concerns in respect of serious wrongdoings related to the Code of Conduct and other Medicover policies, and/or local law and regulations, committed by a person holding a key position or a leading position.

## 3 Who is covered by this Policy?

This Policy applies to every Medicover company and its employees.

## 4 Definitions

When used in this Policy:

The term “**employee**” includes every person who works for or provides services to any Medicover company, under an employment contract or as contracted by Medicover on a self-employed basis or similar. The term “**employee**” also includes every member of the board of directors, management board, supervisory board and other corporate bodies of a Medicover company.

“**HR/Legal**” means, when used in relation to reporting, complaints, questions or concerns, your business unit HR/Legal head, or your division HR/Legal head or Group Legal or Group HR, primarily the one closest to you in the organisation, if you prefer.

## 5 Whistleblowing

### 5.1 What is serious wrongdoing?

Serious wrongdoing involves any illegal or unlawful behaviour, as well as serious irregularities, related to the business activities of Medicover and concerning the vital interests of Medicover, or the life or health of individual(s).

It could include:

- An unlawful act, whether civil or criminal
- Medical malpractice or risking a patient’s safety (if patient data is included, the data must be reported as anonymous data, unless the patient’s consent to disclosing the data has been properly granted)
- Breach of Medicover Code of Conduct
- Breach of Medicover Anti-Bribery Policy
- Knowingly breaching local laws or regulations
- Questionable accounting, fraud or auditing practices

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- Dangers to health, safety or the environment
- Abuse of power or authority for any unauthorised or hidden purpose
- Unfair discrimination, such as discrimination based on age, race, gender, religion, sexual orientation, marital or parental status, political opinion or ethnic background in the course of employment or provision of services
- Conflict of interest
- Manipulation of company data / records / systems
- Attempts to conceal any of the above

The above is not intended to be an exhaustive list, but rather to give examples of the kind of conduct and behaviour that might be considered as serious wrongdoing.

## 5.2 Procedure for reporting

### 5.2.1 When to report?

Concerns about all irregularities and wrongdoings relating to Medicover should be raised through the normal internally available reporting channels, for instance by approaching your line manager or, if the concern regards your line manager, HR/Legal.

The Medicover whistleblower reporting system should be used *only* as a channel for *serious wrongdoings* (as defined above) related to the business activities of Medicover, committed by *persons holding the positions mentioned below*. It should be used only if the normal channels for raising concerns do not effectively address the issue, or if you have reasonable grounds for fearing that you would face retaliation if you used the normal internally available reporting channels.

Only the following types of serious wrongdoing *committed by persons holding a key position or a leading position* may be raised via this channel: (i) accounting, internal accounting controls, auditing matters, combating bribery, and banking and financial crime; and (ii) other serious misdemeanours relating to Medicover's vital interests, or harm to the life or health of individual persons, for instance serious environmental crimes, major deficiencies and medical malpractice, patient safety, workplace security and very serious forms of discrimination or harassment. For further guidance on which positions are considered key or leading, see the Medicover intranet.

### 5.2.2 How to report?

#### General guidelines

An employee who reports a concern of a serious wrongdoing under this Policy should:

- Disclose the information in good faith
- Have reasonable grounds for believing that the information is true
- Not act maliciously, nor knowingly make false allegations
- Not seek any personal or financial gain

Please note that data protection laws and medical confidentiality must be observed.

#### Anonymous versus non-anonymous report

The report should be made in writing, in English or any of the local languages of the countries in which Medicover operates to a defined address for communication provided on the Medicover intranet.

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It will automatically be directed strictly and solely for the attention of the person responsible for whistleblower complaints as set out on the Medicover intranet.

Anonymous reports will be accepted. The report should be made by completing and submitting the report through the anonymous reporting channel available on the Medicover intranet. The message will be directed for attention of the person responsible for whistleblower complaints as set out on the Medicover intranet.

In order to allow for a better investigation of a serious wrongdoing, the employee may want to consider leaving his/her contact details when filing the report. Even if such contact details are provided, the substance of the complaint will be treated with the utmost confidentiality except to the minimum extent necessary for conducting a sufficient and fair investigation.

#### Content of the report

To assist Medicover to investigate adequately, the report should be based on facts, and the following questions should be addressed:

- What happened, and where and when?
- Who was involved?
- Is this expected to happen again? If so, when and where?
- Who else may have knowledge of the above, or may have access to the relevant information?
- Is there any supporting documentation or substantiation of the above incident? If so, please include it.
- Is there any other information that may be relevant and helpful?

### **5.3 Protection**

All employees reporting under this Policy in good faith are assured that no retaliation of any kind will be permitted against them.

### **5.4 False and malicious allegations**

No allegations should be made maliciously or in the knowledge that they are false. Allegations that are not made in good faith are an abuse of the whistleblower process. Medicover will regard these as serious disciplinary offences that may result in disciplinary action, to the extent permitted by law.

### **5.5 Response to reported cases**

In order to protect the individuals and those suspected of the alleged serious wrongdoing, an initial enquiry will be made to decide if an investigation is appropriate and, if so, what form it should take and which persons need to be involved.

Where appropriate, the matters reported may:

- Be investigated by Group HR/Legal, supported by other persons within Medicover as appropriate (and with external advisors or independent auditors if appropriate and necessary).
- Be referred to the police or other law enforcement authorities.

If urgent action is required, such action can be taken before any investigation is conducted.

Once an incidence of serious wrongdoing is reported (unless anonymously), Medicover will respond to the reporting employee within a reasonable time and insofar as applicable data protection laws permit:

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- acknowledging that the concern has been raised,
- indicating how the reporting employee should deal with the matter,
- informing them of whether an initial inquiry will be held,
- indicating whether or not further investigative measures will take place.

The amount of contact between Medicover and the reporting employee will depend on the nature of the matter raised, the potential difficulties involved, and the clarity of the information provided. If necessary, Medicover will seek further information from the employee.

An internal investigation may result in a report being submitted to the relevant law enforcement bodies.

## 5.6 Personal data and confidentiality

For the purpose of this Policy, Medicover will process the employee personal data required for the purposes of this Policy to the extent permitted by applicable data protection laws. This processing will include collecting, storing, and transferring data to third parties, such as law enforcement bodies and external auditors. This will be done only if and to the extent necessary for the investigation and reporting procedures (and technical administration of the reporting channel) and, in any event, only to the extent legally permissible and necessary. The personal data processed will include any information obtained through the whistleblower channel, including the name and contact details of the reporting employee (unless the report is anonymous), and the individuals on whom reports have been made in connection with their function in Medicover. The data processed may include personal data relating to legal offences.

The relevant personal data processed for the purposes set out in this Policy may be kept for as long as necessary and legally allowed. This means that personal data processed in connection with a report that does not lead to any further investigation, or that is unfounded, will be deleted promptly. Reports resulting in an investigation will be deleted once the investigation is complete or, if investigation has resulted in remedial or other actions, kept according to what is outlined in local law and regulations.

Medicover applies both organisational and technical security measures in order to guarantee a lawful and secure investigation, and to ensure that personal data is processed in compliance with applicable data protection laws.

Medicover will treat all reports made under this Policy as confidential to the fullest extent permissible by law and in line with applicable data protection laws, in so far as this is consistent with conducting a sufficient and fair investigation.

## 6 Responsibilities

Managers at all levels are responsible to inform and make Medicover's employees aware of this Policy.

## 7 Contact and questions

General questions regarding this Policy should be directed to the Group HR Director.

Questions of sensitive nature pertaining to this Policy may be submitted to the whistleblower function via the address referred to at the Medicover intranet.

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Author(s)	Group HR Director (Liselotte Bergmark)	19.11.2018	

### Authorisation

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Authorised by	CEO (Fredrik Rågmark)	19.11.2018	
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