



**Remedica**

**WHISTLEBLOWING POLICY**



## 1. PURPOSE

Remedica Limited (hereinafter referred to as the “Company” and together with its subsidiaries the “Group”) is committed to complying with the highest standards of ethical conduct and perform its business at all times fairly, with honesty and integrity. To this respect, the Company expects all Employees of the Group to conduct business with the highest standard of integrity. Improper, unethical or inappropriate behavior within the Group is therefore unacceptable. The Company aims in developing a culture of openness and accountability in order to prevent such behaviors within the Group. Taking this into account, the Whistleblowing Policy (“hereinafter referred to as the Policy”) is expected to encourage all Employees to report to the Company issues involving compromise and/or violation of ethical norms, legal or regulatory provisions and any conduct that may be illegal, unacceptable or improper. The Company also aims to ensure that the rights of any person reporting such incidents are respected and effective procedures are in place that protect and support anonymity and confidentiality. The Policy sets forth the principles for management of the information received through whistleblowing. It acts as reminder of everyone’s ethical and moral duty to take appropriate measures to identify such situations and attempt to remedy them and to allay fears of possible consequences to the whistleblower.

## 2. KEY DEFINITIONS

“Whistleblowing” means providing information, orally or in writing on breaches.

“Whistleblower” is a person who in good faith makes a report in accordance with this Policy

“Retaliation” means any direct or indirect act or omission which occurs in the workplace and is the result of internal reporting and which causes or is likely to cause unjustified harm to the whistleblower.

Employees should not use this Policy for complaints relating to their personal circumstances such as the way they have been treated at work. In such cases, they need to refer to the Company’s Employee Handbook, and the grievance procedure.

## 3. WHISTLEBLOWING POLICY AND THE IMPORTANCE OF REPORTING

This Policy forms an integral part of the Group’s effort to ensure that all incidents of suspected misconduct, illegal acts, infringements, harassment, non-compliance with the Policies of the Company etc., are reported by the Employees (hereinafter collectively referred to as the “Whistleblowers” and individually as the “Whistleblower”) and managed in a timely and appropriate manner.

The whistleblower’s right to speak up is closely related to freedom of expression, freedom of conscience and to the principles of transparency and accountability. It is increasingly acknowledged that effective protection of Whistleblowers against retaliation will facilitate disclosure and encourage open and accountable workplaces.

In light of the above, the Company encourages its Employees to report any violation or suspected violation of any of the Group’s Policies, or any incident for which they reasonably suspect that it has to do with misconduct, fraud, or illegal act without fear of retaliation.

## 4. PROCEDURE

### A. Who can report?

All Employees have a duty to report.

Examples of Incidents that need to be reported are as follows:

- ✓ acts or omissions related to fraud (such as theft, bribery, Corruption).
- ✓ acts or omissions related to non-compliance of the Group's Policies.
- ✓ infringements which endanger or are likely to endanger the safety or health of any person.
- ✓ infringements that cause or are likely to cause damage to the environment.
- ✓ acts or omissions related to financial fraud or mismanagement.
- ✓ Acts or omissions related to employee misconduct.
- ✓ Acts or omissions related to harassment.
- ✓ Acts or omissions related to conflict of interest.
- ✓ The deliberate concealment of any of the above matters.

### B. To whom employees shall report?

Reporting can be done by phone to the HR Team at (+357) 25 553 000 or by email to the e-mail address [HumanResources@remedica.com.cy](mailto:HumanResources@remedica.com.cy). However, if the complaint relates to the HR Team or otherwise the employee does not feel comfortable discussing the matter with the HR Team then the report can be done to the Compliance Team by e-mail to the e-mail address [ComplianceRem@remedica.com.cy](mailto:ComplianceRem@remedica.com.cy).

Once the report is filed and within 7 days, the HR Team or the Compliance Team will provide you with receipt of the report.

In case the Employee wishes to make a report anonymously then he/she can do so by submitting a report through the Company's whistleblowing platform.

### C. Confidentiality

The Company assures all Employees that it will protect the personal data of both the person who reports the breach and the person who is allegedly liable for the breach in accordance with the General Data Protection Regulation EU 2016/679. However, it is crucial to be provided with all available information to allow



the HR Team or the Compliance Team to conduct proper investigation, otherwise, it may be difficult or even impossible to establish whether the allegations are credible and have been made in good faith.

However, should there be an overriding reason for identifying or otherwise disclosing the name of the whistleblower (such as required by law) the whistleblower will be informed in advance.

Whistleblowers who are concerned about possible retaliations if their identity is revealed should come forward to the HR Team or the Compliance Team, who will take additional measures to preserve confidentiality. If the whistleblower experiences a retaliation after reporting a concern such an incident should be reported to the Compliance Office who will handle the matter accordingly.

Reporting can be done by phone to the HR Team at (+357) 25 553 000 or by sending an email to [HumanResources@remedica.com.cy](mailto:HumanResources@remedica.com.cy) or to the Compliance Team by sending an email to [ComplianceRem@remedica.com.cy](mailto:ComplianceRem@remedica.com.cy).

#### **D. Investigation and Outcome**

If there is sufficient evidence to indicate that a compliance violation has occurred then the internal investigations should be initiated promptly. The bulk of the investigation generally consists of the evaluation of documents (including evidence received from the whistleblower), as well as interviews with employees and potential further discussions with the whistleblower.

All investigations will be conducted sensitively, as quickly as possible, and in accordance with this Policy. The investigation should be concluded within three months of the matter being raised, though some scenarios may result in a longer timeframe depending on the complexity of the case.

The HR Team or the Compliance Team shall keep the whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the HR Team or the Compliance Team giving the whistleblower specific details of the investigation, the exact timescale or even any disciplinary action taken as a result. Having said that, it is important to note that in order to allow the HR Team or the Compliance Team to conduct the investigation on the matter properly, the whistleblower should provide all available information having always in mind that such information shall be considered as confidential at all times.

Throughout the investigation procedure, the employee will still be expected to continue his/her duties/role as normal unless deemed inappropriate.

Further, sometimes as the case may be, the HR Team or the Compliance Team may appoint an investigator or team of investigators including staff with relevant experience on investigations or specialized knowledge on the subject matter. The investigator(s) may make recommendations for change to enable us to minimize the risk of future wrongdoing.

Once the investigation has concluded, the whistleblower will receive a written explanation about how the matter has been addressed. If there are legal constraints, e.g. in a criminal investigation, the whistleblower will receive sufficient information about the outcome of any investigation been conducted. If no further



action is proposed the HR Team or the Compliance Team will inform the reasons for this in writing to the whistleblower.

However, if the HR Team or Compliance Team concludes that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action, up to and including termination of employment.

### **E. Anti-Retaliation Policy**

It is understandable that whistleblowers are sometimes worried about possible retaliations. We aim to encourage our Employees to speak openly about concerns/suspicions they may have without the fear of retaliation and we pledge that we will support those who raise concerns in good faith under this Whistleblowing Policy, even if they turn out to be mistaken.

Whistleblowers must not suffer vindictive treatment as a result of raising a concern in good faith. Vindictive treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with a concern.

If a whistleblower believes that he/she has suffered any such treatment, then he/she should report such behavior to the HR Team or the Compliance Team immediately. If the matter is not resolved then the whistleblower should raise it formally by using the Company's Complaint Procedure, which can be found in the Employee Handbook.

Lastly, we assure all Employees that anyone involved in such a retaliation conduct will be subject to disciplinary action that could even lead to dismissal.

### **F. Record Keeping**

The Company shall, at all times keep records of every report received, in compliance with the confidentiality requirements.

Personal data collected in the context of receiving reports is deleted within three (3) months from the date of completion of the procedure. In addition, in the event that legal or disciplinary proceedings are instituted against the individual against whom the report was made the personal data shall be retained for the duration of those proceedings, including in the event of an appeal or objection, and after one (1) year from their processing, are deleted.

In the event that a telephone line or other telephone message recording system is used for reporting, subject to the consent of the Whistleblower, the Company has the right submit a report in one of the following ways:

- ✓ By recording the conversation in a stable and retrievable form.
- ✓ With full and accurate observance of the conversation minutes by the HR Team or the Compliance Team who is responsible for handling the report.

The Company may ask the Whistleblower to verify, correct and agree to the transcript of the conversation by signing it.

In the event that a telephone line or other telephone messaging system is used for the submission of a report without recording the conversation, the Company has the right to document the oral submission of the report, in the form of accurate minutes, prepared by the HR Team or the Compliance Team.

In the event that the Whistleblower requests a meeting with the HR Team or the Compliance Team to submit a report then the HR Team shall ensure, subject to the Whistleblower's consent that complete and accurate minutes of the meeting are kept in a stable and recoverable form.

The Company has the right to keep minutes of the meeting in one of the following ways:

- ✓ By recording the conversation in a stable and recoverable form.
- ✓ With exact minutes of the meeting drawn up by HR Team or the Compliance Team who is responsible for handling the report.

The Company may ask the Whistleblower to verify, correct and agree with the minutes of the meeting by signing them.

## **G. External Reporting**

The aim of the Whistleblowing Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

The whistleblower should be able to choose the most appropriate reporting channel depending on the circumstances of the case. However, we encourage using internal channels before external reporting, where the breach can be effectively addressed internally and without the risk of disclosure of confidential information or retaliation.

Furthermore, nothing in this Whistleblowing Policy, the Employment Contract or any Severance Contract with the Company, shall be construed as prohibiting an employee from reporting possible violations to the external competent authorities appointed for such purposes. The employee does not need Company's prior authorization to make any such reports however, it is recommended to notify the Company for same.

## **H. Not Happy With The Outcome**

The Company cannot always guarantee the outcome the Employee is seeking for, but it does guarantee that it will handle the case in a professional and fairly manner. By using this Whistleblowing Policy, you can help us to achieve this.

If you are not happy with the way your case has been handled, you may raise it with the Group Compliance Officer on +44 20 3815 3383 or [compliance@letterone.com](mailto:compliance@letterone.com).



## I. Compliance Resources

The Company has a number of resources and people available to answer any of employees' questions and guide them through difficult compliance decisions.

Employees should feel free to reach out to the HR Team or the Compliance Team ~~and~~ they have any questions in connection with this Policy or any of the Group's other policies and procedures.

Head of Legal and Compliance Department: Elina Skoullou

Contact Number: (+357) 25 553 584

Email Address: [E.Skoullou@remedica.eu](mailto:E.Skoullou@remedica.eu)

[ComplianceRem@remedica.com.cy](mailto:ComplianceRem@remedica.com.cy)