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Content

1	Introduction	3
2	Purpose of this Medicover Whistleblower Policy	3
3	Who is covered by this Policy?	3
4	Definitions	3
5	Whistleblowing	3
5.1	What is serious wrongdoing?	3
5.2	Procedure for reporting	4
5.2.1	When to report?	4
5.2.2	How to report?	4
5.2.3	EU Whistleblower Protection Directive	5
5.3	Protection	5
5.4	False and malicious allegations	5
5.5	Response to reported cases	6
5.6	Personal data and confidentiality	6
6	Responsibilities	7
7	Contact and questions	7

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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, Medicover has established whistleblower functions.

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.

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.

"**EU Whistleblower Protection Directive**" means 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, and any subsequent amendments, modifications and addenda thereto.

"**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, 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

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- Knowingly breaching local laws or regulations
- Fraud, embezzlement or money laundering
- Questionable accounting or auditing practices
- 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
- Anti-competitive behaviour
- Breach of data protection/privacy laws and/or internal instructions regulating the processing of data
- Retaliation aimed at somebody who has reported concerns in accordance with this Policy
- 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. 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.

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.

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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.

It will automatically be directed strictly and solely for the attention of the persons 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 persons 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?

5.2.3 EU Whistleblower Protection Directive

For the legal entities within the Medicover group that are required to operate their own whistleblower channels under the EU Whistleblower Protection Directive, you will find contact information on the website of those respective legal entities should you wish to file a report with one of them.

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.

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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 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 incident of serious wrongdoing is reported (unless anonymously), Medicover will acknowledge receipt of the employee report within seven days, insofar as applicable data protection laws permit and where applicable:

- indicate how the reporting employee should deal with the matter,
- inform the reporting employee of whether an initial inquiry will be held,
- indicate whether or not further investigative measures will take place.

Feedback shall be provided to the reporting employee within a timeframe not exceeding three months from the acknowledgement of receipt of the report.

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.

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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 General Legal Counsel or Corporate Compliance Officer.

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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