

# Safeguarding

# Integrity

Enabling our people to voice their concerns in a responsible and effective way.



## The Whistleblower's Protection

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The whistleblower can be defined as an individual working for Fagron who reports an incident, concern or violation of the law, our Code of Business Conduct and/or policies in good faith. Investigating the incident and taking measures is not part of the whistleblower's responsibility. Fagron will see to solving the case.

**The whistleblower is protected from retaliation if a report in good faith and to the best of knowledge is submitted.** A report in good faith means that the whistleblower had reasonable grounds to believe the information as submitted was true at the time of the reporting. If in any case it turns out that the information submitted was not true, but the investigation showed that the report was made in good faith, the whistleblower will still be protected from retaliation or detriment.

Malicious reports (reports that deliberately have wrong/misleading information) are prohibited and may lead to legal consequences.





# Reporting Channels

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At Fagron, we support an open culture where employees feel able to freely discuss concerns and raise questions. For that reason, we have multiple channels available for our employees to confidentially reach out to, and regardless of the chosen reporting channel, the identity of the whistleblower and any person involved is kept confidential

## Manager / Human Resources

The primary point of contact should, when possible, always be the manager or supervisor of the employee who wants to raise a concern or wants to file a report. However, if the employee feels that the matter cannot be addressed to the manager, the employee can always speak in confidence with the local HR responsible.

All concerns and reports made via the manager or Human Resources are treated with the highest confidentiality and will be maintained confidential to the fullest extent possible.

## The Confidential Counselor

The Confidential Counselor\* is someone working for Fagron who employees can reach out to if they feel they have been subjected to unwanted behavior (such as discrimination, bullying or harassment) or when they suspect misconduct (such as fraud, corruption, theft). The Confidential Counselor will act as a point of contact for employees and guides them towards the proper reporting channel or provides the employee with advice and support.

Employees can reach out to the Confidential Counselor if they are unsure which reporting channel is most suitable for their concern / report, but also if they would like to confidentially talk to someone other than the manager or HR responsible.

All concerns and reports made via the Confidential Counselor are treated with the highest confidentiality and will be maintained confidential to the fullest extent possible.

\*Not all companies have a Confidential Counselor yet. The expectation is to have a Confidential Counselor at each company in 2023.

## The Fagron Integrity Line

If the employee feels that speaking up and discussing a concern or dilemma with the Confidential Counselor, manager or HR responsible is not reasonably possible, they can always report concerns **anonymously** via a secured and independent link: <https://compliance.fagron.com>.

The anonymous report will be assessed via the 4-eyed principle on a global level and if possible, a local case manager will be assigned to support in solving the case.

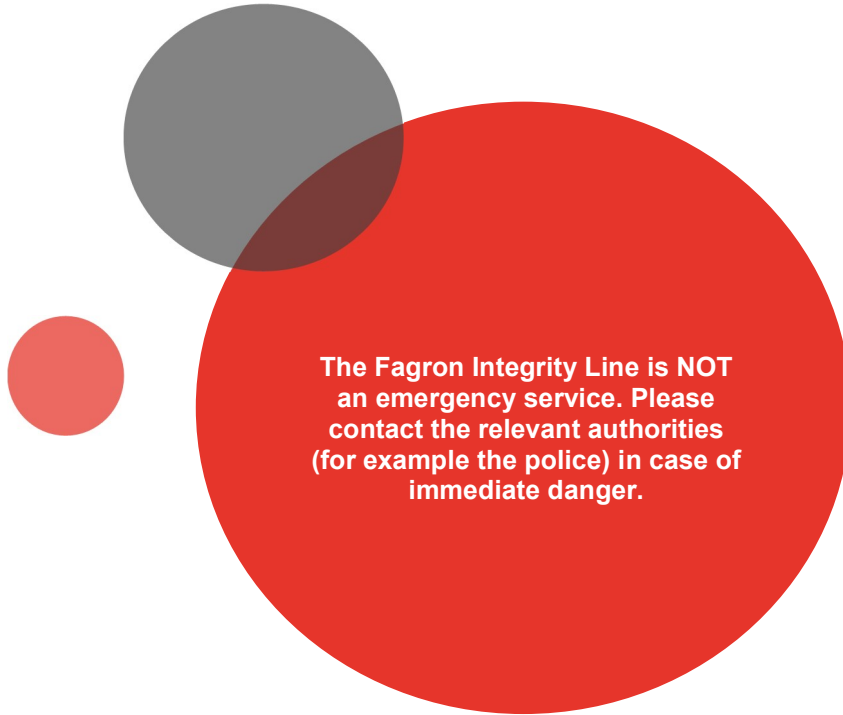
All concerns and reports made via the Fagron Integrity Line are treated with the highest confidentiality and will be maintained confidential to the fullest extent possible.

The Fagron Integrity Line is operated by the external provider EQS. EQS is a leading international provider of regulatory technology specialized in the field of corporate compliance. Amongst other things, they ensure the professional control of compliance workflows of whistleblower protection and case management.

EQS maintains technical measures to ensure full data protection and confidentiality (ISO 27001). It allows individuals to communicate **anonymously** via an encrypted connection of the Fagron Integrity



Line. This means that IP addresses, location data, device specifications or other data that could allow certain conclusions about the whistleblower's identity are not stored on the servers, The whistleblower can decide on its own to disclose any personal information.





# Reporting Procedure

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Any concern, misconduct, violations of applicable laws and regulation, internal instructions, procedures and policies (hereafter referred to as 'incident') need to be reported as early as possible.

## Making a Report

The Fagron Integrity Line allows employees to file a report via a secured and independent link: <https://compliance.fagron.com>.

The whistleblower will be asked to answer a few questions to be able to obtain more information about the incident and to describe the incident in as much detail as possible. A fully described report enables Fagron to work on the case more timely and effectively.

It is strongly recommended to upload documents, if available, that help prove the incident.

After the report is submitted, an incident number is provided to the whistleblower that can be used to access the personal and protected inbox for the follow-up on the incident without disclosing the identity. The whistleblower is also asked to enter a password - **it is very important to immediately write down and save the incident number and password**, as it is not possible to retrieve it once lost. The only option to follow-up on the incident will then be to file a new report.

The report will be processed securely by the global authorized persons of Fagron and the whistleblower will receive a response or a request for further information within 7 working days. The response can be accessed through the personal and protected inbox on the landing page of the Integrity Line.

## The Investigation Process

Fagron is committed to conducting an investigation that is fair to all involved parties.

**The Compliance & Ethics Team will firstly assess each individual report based on a few criteria: credibility of the report (based on content, details and uploaded documentation), gravity of the incident, if disclosed – the ability to protect the whistleblower's identity throughout the process, scope of the incident and involved parties.**

Depending on the result of the assessment, a local case manager will be assigned to investigate the reported case.

Fagron strives to close the reported case within 90 working days after the initial assessment of 7 working days (see 'Make a Report'). This period may extend depending on the gravity of the incident and / or the information provided to the investigation team to work with.

## The Follow-up

With 'transparency' as one of the Fagron family rules, we are committed to keeping the whistleblower informed about the progress of the reported incident. However, we must bear in mind that balancing the interest of the whistleblower to receive updates and the need to keep the investigation and outcome confidential is very important to protect the investigation process and the involved and/or accused parties.

**The protection of the investigation and its process is taken very seriously, and the outcome of the result cannot always be shared or are not always visible to everyone.** Especially in the case of disciplinary measures against a person.



## Reporting to the Audit Committee

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As a publicly listed company, Fagron has the responsibility to update the Audit Committee on a regular basis about the whistleblowing program: incoming reports, investigations and results.

There is a formal procedure in place to ensure that the appropriate outcomes are achieved. The Executive Leadership team of Fagron has the responsibility to inform the Audit Committee during their quarterly gatherings, where they provide the Audit Committee with a complete list of all reported cases.

In the event that an incoming report indicates a serious risk for our business, the Audit Committee will be informed immediately, and appropriate measures will be decided



# Embrace our Code, Embody our Commitment

Our actions shape our future.

Thank you for taking the time to read and understand our Code of Business Conduct.

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