

## WHISTLEBLOWING POLICY

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### OVERVIEW

Healthcare 21 (hereinafter referred to as the “Company”) is determined to ensure that employees are aware of their rights and responsibilities in relation to protected disclosures, commonly known as whistleblowing.

### PURPOSE

The purpose of this policy to inform workers/members of public on how to raise concerns or whistle blow wrongdoing within or by the Company. The Company will investigate possible malpractice and take appropriate steps to deal with it.

Under the policy and in line with relevant jurisdictional legislation, a worker and any member of public is entitled to raise concerns or disclose information without fear of penalisation or threat of less favourable treatment, discrimination, or disadvantage. The Company is prohibited from carrying out any act or omission that affects an employee to their detriment including suspension, lay off, demotion etc. To benefit from this legal protection, the worker/public member must show that they had a reasonable belief that a relevant wrongdoing had occurred or is likely to occur.

This policy is not a:

- substitute for the Grievance procedure;
- channel for employees to raise matters relating to their terms & conditions of employment.

### DEFINITIONS

Item	Definition
Whistleblower	Anyone who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within a Company.

### SCOPE

This policy applies to everyone that has a legitimate concern.

### POLICY

#### WHEN TO WHISTLEBLOW

The Company strives to achieve transparency and a high level of business ethics and is committed to an open culture with the highest standards of honesty and accountability.

The Whistleblowing service can be used to alert the Company about serious risks of wrongdoing, affecting people, its organisation, the society, or the environment. Certain disclosures afford workers some protection under law, definitions of relevant wrongdoings for the purposes of this policy include but not limited to the following:

- failure to comply with any legal obligation (other than a workers Contract of Employment)
- a miscarriage of justice;
- endangerment of health and safety;
- damage to the environment;
- unlawful or otherwise improper use of funds or resources of a public body, or of other public money;

- oppressive, discriminatory, or negligent behaviour by a colleague, the company, or a public body;
- Breaches of EU or UK law;
- Concealing or destroying evidence of wrongdoing

## HOW TO WHISTLEBLOW

There are different ways to raise a concern:

- **Option 1:** Contact a member of the Company dedicated whistleblowing team via <https://report.whistleb.com/en/message/hc21> or directly on:
  - Sylvia Stafford, Chief Operations Officer, +353 86 603 8048 or [sylvia.stafford@hc21.group](mailto:sylvia.stafford@hc21.group)
  - Kelly Uphill, Chief People Officer, +44 7711 368240 or [kelly.uphill@hc21.group](mailto:kelly.uphill@hc21.group);
- **Option 2:** Anonymous or confidential messaging through the whistleblower reporting channel to whistleblowing team: <https://report.whistleb.com/en/addlife#>;
- **Option 3:** If having considered the options available, employees may decide to report to an external channel maintained by a relevant competent authority:
  - Ireland - <https://www.opdc.ie/>
  - UK - <https://www.gov.uk/whistleblowing>

All communication received will be handled confidentially. The whistleblowing channel is managed by WhistleB, an external service provider. All messages are encrypted. To ensure anonymity of the person sending a message, WhistleB deletes all metadata, including IP addresses. The person sending the message also remains anonymous in the subsequent dialogue with the responsible receivers of the report.

## THE INVESTIGATION PROCESS

### The Whistleblowing Team

Access to messages received through the whistleblowing channel is restricted to trained and appointed individuals with the authority to investigate whistleblowing cases. Actions are logged and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process, upon consent from the whistleblower in case identity of the reporting person is disclosed. These individuals can access relevant data and are also bound to confidentiality.

### Receiving a message / disclosure

Upon receiving a disclosure, the whistleblowing team decides whether to accept or decline the disclosure. If the disclosure is accepted, appropriate measures for investigation will be taken and are outlined below.

The whistleblower will receive an acknowledgement of receipt of the report within 7 days, irrespective of accepting or declining the disclosure.

The whistleblowing team may not investigate the reported misconduct if:

- The alleged conduct is not reportable conduct under these Whistleblowing guidelines;
- The disclosure has not been made in good faith or is malicious;
- There is insufficient information to allow for further investigation;
- The subject of the disclosure has already been solved

If a disclosure includes issues not covered by the scope of these Whistleblowing guidelines, the whistleblowing team should provide the reporting person with appropriate channel to report these concerns.

The whistleblowing team will send appropriate feedback within 3 months upon the date of receiving the report.

### **Investigation**

All disclosures are treated seriously and in accordance with the following Whistleblowing guidelines:

- No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- The Whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.
- A disclosure will not be investigated by anyone who may be involved with or connected to the wrongdoing.
- Whistleblowing messages / disclosures are handled confidentially by the parties involved.
- Corporate or external expertise may be included in the investigation upon consent from the whistleblower.

## **PROTECTION AND PRIVACY**

### **Whistleblower Protection**

A person expressing genuine suspicion or misgiving according to this policy will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided they are acting in good faith.

Subject to the considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a whistleblower will be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offences, the anonymous whistleblower will be informed that their identity may need to be disclosed during judicial proceedings.

### **Processing of Personal Data**

This whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, in order to investigate facts on the declared misdeeds and inappropriate behaviour eligible under the Company code of conduct or internal rules. This processing is based on statutory obligations and the legitimate interest of the controller to prevent reputational risks and to promote an ethical business activity. The provided description and facts under this processing are only reserved to the competent and authorised persons who handles this information confidentially. An employee may exercise rights of access, of rectification and of opposition, as well as of limited processing of personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case. Data is stored within the EU. For further questions or complaints, please contact Sylvia Stafford, Chief Operations Officer, +353 86 603 8048, [sylvia.stafford@hc21.group](mailto:sylvia.stafford@hc21.group) or Kelly Uphill, Chief People Officer, +44 7711 368240, [kelly.uphill@hc21.group](mailto:kelly.uphill@hc21.group).

### Data Protection

All data will be stored and deleted in line with GDPR (General Data Protection Regulations) and the Company data retention policy.

### Personal Data Controller

The Company is responsible for the personal data processed within the whistleblowing service. The Data Protection Officer is Freda McEnroe, [freda.mcenroe@hc21.group](mailto:freda.mcenroe@hc21.group).

### Personal Data Processor

WhistleB Whistleblowing Centre Ab (World Trade Centre, Klarabergsviadukten 70, SE-107 24 Stockholm) is responsible for the whistleblowing application, including processing of encrypted data, such as whistleblowing messages. Neither WhistleB nor any sub-suppliers can decrypt and read messages. As such, neither WhistleB nor its sub-processors have access to readable content.

### Document Details

Document ID	Whistleblowing Policy	
Owner	Human Resources	
Author & position	Kelly Uphill	Chief People Officer
	Sylvia Stafford	Chief Operations Officer

### Document Revision history

Revision no.	Reviewed by	Role	Date	Change description
1.0	Kelly Uphill Sylvia Stafford	Chief People Officer Chief Operations Officer	March 2024	Policy written & launched