

WHISTLEBLOWER POLICY

SYNEVO HRVATSKA - poliklinika

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1. DOCUMENT INFORMATION

Entry into force:	15.12.2025.
Version	3.1
Recipient list	

2. Purpose of the Whistleblower Policy

SYNEVO HRVATSKA – poliklinika, with its registered office in Zagreb, Miroslava Kraljevića 24, OIB: 27878391929, (hereinafter: "**SYNEVO**", "**Polyclinic**" or "**we**"), as part of the Medicover group (Medicover AB (publ), hereinafter: **the "Group** is subject to various laws and regulations concerning the protection of persons reporting irregularities (so-called whistleblowers) and the reporting of irregularities. In addition, we have an ethical responsibility towards our patients, clients, employees and business partners.

If applicable laws and regulations are violated, it can lead to significant risks for SYNEVO and its employees. SYNEVO's task is therefore not only to ensure that all employees comply with applicable laws and regulations, but also to ensure that any non-compliance with laws and regulations is identified, investigated and prevented in the future.

To this end, we strive to create an open and trustworthy working environment where questions, doubts, concerns and irregularities can be reported without fear of retaliation. As part of these efforts, pursuant to the Whistleblower Protection Act (Official Gazette No. 46/2022, 136/2025) and Directive (EU) 2019/1937, we are adopting this Whistleblower Policy (hereinafter: the "**Policy**").

3. Scope of the Whistleblower Policy

This Policy applies to all employees, including trainees, volunteers, associates, students performing student jobs, self-employed persons, contractors and subcontractors, members of the management board as well as persons who participate in any way in the activities of SYNEVO. For the purposes of this Policy, the term employees also includes persons who participate in recruitment procedures as candidates.

The intention of this Policy is to encourage and enable the reporting of established and serious suspicions of violation of applicable laws and regulations, as well as all other internal regulations and guidelines, that become known to you during the performance of your duties. In particular, we expect you to report the following cases in accordance with this Policy:

- Violations of applicable local and international laws and regulations, in particular in relation to corruption, bribery, fraud, danger to life, health and safety (including overtime), risk of large-scale damage or destruction of evidence, conflicts of interest, violations of human rights (including labour rights, discrimination, harassment, etc.), unfair

competition, violations of tax regulations, bookkeeping regulations, regulations on money laundering and environmental pollution (water, air, soil, etc.);

- Violations of internal rules and regulations, in particular regulations at the Group level;
- Questions regarding the safety and quality of the services we provide.

4. Main principles

4.1. Protection against retaliation and prohibition of abuse

SYNEVO strongly believes that effective systems and a culture of openness and transparency of the reporting structure and an open and transparent culture help to protect SYNEVO, its employees, patients, clients and business partners from harm and reputational damage.

SYNEVO therefore follows a policy of non-revenge. Therefore, neither you nor any other person should fear any negative consequences of a discriminatory or disciplinary nature for reporting or expressing concerns, doubts and problems, as you are protected by applicable laws. We do not tolerate any kind of threats, actions to your detriment or retaliatory behavior. Such behavior is in itself a violation of our values and can lead to disciplinary action.

This non-retaliation policy also applies if you are not completely sure of the facts, provided you act in good faith. Acting in good faith means that you have reasonable grounds to suspect, given the circumstances known to you at the time of reporting, that the information you are reporting is true and that you are acting diligently and fairly.

However, intentional misuse of the reporting system and this Policy for harmful practices (i.e. malicious reporting) is strictly prohibited. A person who knowingly reports incorrect information is not protected by this Policy and appropriate proceedings may be initiated against them. In addition to knowingly reporting incorrect information, malicious submission of a report also implies seeking an unlawful benefit in connection with the report and taking other actions aimed solely at causing damage to SYNEVO.

Furthermore, this Policy does not guarantee protection against whistleblowers if you yourself have been involved in the reported violation. Nevertheless, the fact that you have reported this violation can be considered as a mitigating circumstance in accordance with the regulations applicable to the relevant procedures.

4.2. Confidentiality and anonymity

SYNEVO will keep the personal data of the whistleblower as well as the data received in the report confidential, to the extent in accordance with the law. The person to whom the whistleblower reports irregularities and any other person who participates in the procedure for reporting irregularities is obliged to protect the information learned in the report.

Our reporting system allows anonymous reports to the extent permitted by applicable laws and regulations, in particular data protection laws and regulations and labor law and related

regulations. Nevertheless, it is possible that your role as a person who reports or who has been accused by others becomes known during subsequent investigations. In any case, the Polyclinic, i.e. the confidential person, will do everything possible to keep your identity and your reports secret, unless:

- you have given your consent for the disclosure;
- the disclosure is necessary to comply with a legal obligation to which SYNEVO is subject;
- the data must be disclosed to the authorities upon request.

Please note that the investigation of your report, and therefore the resolution of your concerns, is generally facilitated if you do not submit the report anonymously and if we are able to contact you in case of any question

4.3. Data protection

SYNEVO gives great importance to data protection and privacy as well as data security requirements. Therefore, we comply with applicable data protection laws and regulations as a minimum standard and in relation to this Policy.

(a) Notification of irregularities to persons who are the subject of a report

The Polyclinic or the confidential person will inform the persons whose behavior was reported about the allegations in the report after receiving the report, if such notification is necessary for the handling of the report and if such disclosure is in accordance with applicable regulations and data protection regulations.

If the condition from the previous paragraph is met, the persons reported in suspicion of irregularities will be informed of the allegations in the report from the person responsible for processing the report (confidential person) within one month.

However, if such notification may jeopardise the effectiveness of the investigation, the protection of evidence or the reporting process, notification will only be given if and when such risks no longer exist. This requires a case-by-case analysis.

In any case, the identity of the reporting person will not be disclosed unless it is strictly necessary for the Polyclinic or the confidential person to act in accordance with a legal obligation to which he is subject or for other legitimate purposes and, furthermore, if permitted by applicable data protection laws and regulations. Whistleblowers, reported persons or third parties shall be informed of any disclosure of their identity prior to the disclosure itself, unless such notification would jeopardise related investigations or court proceedings.

(b) Data retention

Records of your reports and related investigations are stored in accordance with applicable laws for as long as necessary to achieve the legitimate purposes of SYNEVO. Legitimate purposes include operating internal reporting channels, effectively managing compliance, establishing, exercising or defending legal claims, or ensuring compliance with legal obligations to which SYNEVO is subject. Records of your reports will generally be kept for a period of 3 (three) years after the completion of the reporting process under this Policy. Records may be kept for longer to comply with legal obligations for as long as necessary and

proportionate and are then deleted in accordance with applicable data protection laws and regulations.

Accordingly, data relating to ongoing disputes or investigations will not be deleted for as long as the storage of such data is necessary for the purposes of those proceedings. In such cases, the information is retained for the duration of the relevant dispute or investigation, or even longer, where necessary and permitted under applicable data protection laws and regulations.

5. Procedure for submitting reports and follow-up actions

5.1. Appointment of a confidential person

SYNEVO shall appoint a confidential person for the reporting of irregularities and their deputy, upon the proposal of the employee council or, where it has not been established, upon the proposal of at least 20% of the employees. SYNEVO shall invite the employee council or the employees to submit proposals for the appointment of a confidential person and their deputy. If the employee council or the employees fail to submit a proposal for the appointment of such person within the time limit specified in the invitation, calculated from the date of receipt of the invitation, SYNEVO shall independently adopt a decision on the appointment of the confidential person for the reporting of irregularities and their deputy.

Until the first appointment of a confidential person in accordance with this Policy, the duties of a confidential person shall be performed by an already appointed person, in accordance with the Policy and applicable regulations.

The confidential person and their deputy must give written consent to the appointment.

The confidential person and their deputy may be revoked (relieved of duty) upon the proposal of the employee council or, where it has not been established, upon the proposal of at least 20% of the employees. In such case, SYNEVO shall initiate the procedure for the appointment of a new confidential person and their deputy within 30 days from the date of revocation of the previous confidential person and their deputy. The confidential person and their deputy perform the tasks prescribed by the Whistleblower Protection Act.

SYNEVO will publish and make available to all employees in a timely manner the decision on the appointment of the confidential person and their deputy, which includes the appropriate contact details for the submission of whistleblowing reports.

SYNEVO shall not affect the actions of the confidential person or their deputy, nor place them at a disadvantage due to the performance of their function.

5.2. Internal reporting

The submission of reports of suspected irregularities and breaches is encouraged at all times.

When you submit your report, we ask you to submit a description of your report. Please note that the more information you provide in your report, the better we will understand and investigate the reported information. Therefore, we ask you to submit all relevant information,

including information about the employer, information about the person and/or persons to whom the report relates, the date of the report and a description of the irregularity being reported, as well as supporting documentation or other evidence that may be helpful in investigating your report, as well as information about you as a whistleblower, if you want to share this information.

If you wish to submit a report, you can do so directly in writing (in any form provided by a written record, e.g. by email or regular mail), orally (by telephone, oral statement on the record, voice message or physical meeting) to one of the following reporting channels:

- You can submit a report to **the appointed confidential person for reporting irregularities or their deputy** in person, via a physical meeting;
- You can submit a report to **the appointed confidential person for reporting irregularities or their deputy** via the telephone number, e-mail address or reporting link attached to this Policy.

Upon receipt of your report, we will contact you and inform you about the status of your report in accordance with the applicable regulations.

5.3. External reporting

We encourage reporting directly and internally to SYNEVO as such violations of the law may undermine our core business values and high standards of ethics and integrity.

However, whistleblowers may report certain breaches to the competent national authorities in accordance with the Whistleblower Protection Act. Such persons may obtain information on the website of the competent authority in the Republic of Croatia on the procedures and conditions for reporting irregularities in accordance with the applicable laws and regulations.

A whistleblower may report an irregularity to the competent authority for external reporting after having first submitted a report through the internal reporting system, or directly to the competent authority for external reporting. In the Republic of Croatia, the competent authorities for external reporting of irregularities are the Ombudsperson, the police, and the State Attorney's Office of the Republic of Croatia (DORH).

6. Questions and doubts

If you have any questions about this Policy, please contact hr.prodaja@synevo.com or, at Group level, you can contact the General Legal Counsel or the Corporate Compliance Officer. You will get all the support and information from them. The same applies if you find any violations of this Policy.

7. Correction history

Version	Effective Date	Description of corrections
1.0	07.12.2021.	New Policy
1.1	13.7.2022.	Harmonization with the new Whistleblower Protection Act, additional internal reporting channel
2.0.	25.8.2023.	Alignment reflecting regulatory changes
3.0	15.10.2025.	New Policy
3.1.	15.12.2025.	Alignment reflecting regulatory changes – additional external and internal reporting channels

Reporting via e-mail:

As stated above, **you can submit** your report via **the following e-mail address:**
nives.antic@synevo.com

or petra.pozaic@synevo.com

Reporting via link:

<https://report.whistleb.com/en/synevo-hrvatska-croatia-external>

Reporting via phone:

If you choose to report by phone, you can do so by using **your phone number:**

Phone number for reporting
+385 91 2333 382 ; +385 91 2691 030