

Immedica SpeakUp Policy

Adopted by:	Board of Directors
Adopted on the:	April 18, 2023
Effective date:	April 18, 2023
Applicable to:	All employees. All consultants.
Function responsible for this policy:	General Counsel & Compliance Officer

1. SCOPE & PURPOSE

- 1.1 This SpeakUp policy describes the means by which reports of confirmed or suspected incidences of fraud and misconduct are handled.
- 1.2 The SpeakUp policy applies to all employees and consultants of Immedica.
- 1.3 To further engender compliance in Immedica, a route for the public to speak up about any potential misconduct within Immedica should also be available through Immedica's webpage www.immedica.com. A reporter who is not an Immedica employee or consultant will not have to follow this policy but Immedica's handling of such report will be made in accordance with this policy.

2. DEFINITIONS

Integrity Officer means the person who is managing the report in Immedica, see further Section 4.1.

People Intouch means the third party company that hosts the Speak Up line.

Reporter means the victim/witness/bystander who decides to report a serious breach of the Code of Conduct or the law that might otherwise not be reported.

3. SUSPICION OF MISCONDUCT/ FRAUD

3.1 All employees with knowledge of suspected misconduct are encouraged to report suspicions of fraudulent or unethical conduct and any violation of any legislation, the Code of Conduct or any other internal governing document.

Only reports which fall under the scope of 3.1 will be processed according to this policy. Examples of cases which are exempt from this policy and from the handling in the SpeakUp system are mis-content with the salary or other decisions made by a manager, in compliance with laws and internal governing documents, that an employee disagrees with and would like to have over-ruled. Such cases should be processed through your manager or your manager's manager.

3.2 All employees are encouraged to report these suspicions through normal reporting procedures.

Normal reporting procedures are:

- i) Reach out to your manager, or your manager's manager.
If you do not feel comfortable doing this, then go to ii)
- ii) Reach out to the Compliance Officer:
complianceofficer@immedica.com

If you do not feel comfortable using any of the normal reporting procedures, then you should report your concerns and engage in communication via SpeakUp



3.3 SpeakUp is available 24 hours a day. The SpeakUp line is hosted by an independent third party named People Intouch. The contact details are enclosed in **Appendix 1**.

3.4 Through the SpeakUp Line, reports can be made anonymously.

- 3.5 In order to minimise unclear and false reporting, Immedica has decided not to investigate any anonymous reports, which are received through other channels than the SpeakUp Line.

4. REPORTING IN BAD FAITH

- 4.1 Immedica takes the practice of reporting in bad faith very seriously. This act is considered to be a serious breach of the Code of Conduct and disciplinary action will be considered against employees reporting in bad faith.

5. ASSIGNING RESPONSIBILITIES

- 5.1 All reports coming in through the SpeakUp Line will be made available to the Compliance Officer and the CFO. If the Compliance Officer or the CFO is, or is suspected to be, involved in the matter and there might be a conflict of interest, then you should use a separate back-up with a different web address (URL). The recipients on the back-up line is the CEO and the Head of Business Development, and the Compliance Officer and the CFO do not have any access to this back-up line, and they will be excluded from all further processes regarding such report. The Compliance Officer / CFO for the ordinary SpeakUp Line, and the CEO/Head of BD for the Back-Up Line, as applicable, will below be referred to as the “**Integrity Officer**”.

- 5.2 The Integrity Officer, will upon receipt of reports of alleged misconduct or fraud, evaluate and assess the information received, and determine the appropriate course of action. This will, in most cases, result in the responsibility for next steps being assigned to the most appropriate person. The Integrity Officer will ensure that all reported cases are investigated, documented appropriately, and submitted to the designated offices.

- 5.3 Immedica expects management at all levels to handle all matters concerning any misconduct seriously, confidentially and promptly. Management is obliged to cooperate fully with and assist whoever is appointed to investigate the misconduct.

6. REPORT NOT UNDER INVESTIGATION

- 6.1 The Integrity Officer has the right *not* to investigate a report. This can be the case when:
- i. There is insufficient information for an adequate investigation and if there is no possibility of obtaining further information;
 - ii. It is established that the report was made in bad faith.

7. PROTECTION & RIGHTS OF THE REPORTER

- 7.1 If the reporter decides to share their identity, then the information shared will be forwarded to Immedica. If the reporter chooses to be anonymous then no information about the reporter will be forwarded to Immedica. The identity of all reporters will be protected and Immedica has a strict policy of non-retaliation against reporters under this procedure. The third party that hosts the SpeakUp line, People Intouch, will never disclose voice-file, IP addresses or phone numbers, unless a reporter falls outside of the scope of protection according to 7.4 (ii), in which case this information could be shared with relevant authorities. The report will be shared within Immedica on a strict need to know-basis to handle the case, with due consideration to exclude any person who is not fit to process the matter due to the nature of the report.
- 7.2 The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated. Becoming a reporter does not, however, automatically result in immunity for misconduct.
- 7.3 This protection is applicable to those reporters who follow this Internal Misconduct Reporting Procedure.
- 7.4 Even when the procedure has been followed correctly, there are two exceptions when a reporter's protection cannot be guaranteed, as listed under i) and ii) below. In these matters, the authorities might be involved. Voice file, IP addresses and telephone number might in those cases be handed over to the authorities, but they will never be handed over to Immedica. The two exceptions when a reporter's protection cannot be guaranteed are:
- i. In cases where it is established that a report has been made in bad faith;
 - ii. If the report itself is a criminal offence (such as a serious threat);
- 7.5 If the reporter is not satisfied with the follow-up and/ or outcome of the report, or, if the reporter doesn't feel protected then the reporter can file a complaint directly at the Compliance Officer or through the SpeakUp Line.

8. PROTECTION & RIGHTS OF THE ACCUSED

- 8.1 When a person is officially under investigation, then this person needs to be notified about this fact. Immedica will notify the person under investigation as soon as possible. This period can be extended if there is a substantial risk of destruction of evidence and/or impediment to the investigation.

8.2 The investigated person has the right to appeal against the fact of being reported for investigation. A subject under investigation can turn to the Integrity Officer for rectification.

9. DATA PROTECTION & PRIVACY

9.1 Immedica and the Integrity Officers will treat all information received in strict confidence. The privacy of both the reporter and the subject(s) in the reports will be protected. Information will only be shared on a strict need-to-know basis. If the SpeakUp Line (2.4) is used, information will also be accessed by staff of the service provider People Intouch – again, only on a need-to-know basis.

9.2 The SpeakUp policy relies on the processing of personal data; therefore data protection rules are applicable. Immedica complies with the applicable rules.

10. CONTACT DETAILS

Dial-in details for SpeakUp is enclosed in **Appendix 1**

Compliance Officer
Nina Fleck
complianceofficer@immedica.com
+46 70 410 77 35

Country specific dial-in details for SpeakUp

– ordinary line (Compliance Officer and CFO are receiving Integrity Officers)

Country	Telephone number	Webservice URL	Access code	Language
AUSTRIA	0800909683	https://immedica.speakup.report/messages	105054	English and Swedish
DENMARK	004543310961			
FINLAND	0800392912			
FRANCE	0805543753			
GERMANY	08001818952			
ITALY	800147694			
POLAND	00800012953			
ROMANIA	0800400653			
SLOVAKIA	0800113418			
SPAIN	0034900031156			
SWEDEN	0201604703			
United Arab Emirate	80004440408			
United Kingdom	08000224118			