



Policy

CLN-POL-0000044 Global Speak Up (Whistleblowing) Policy

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RR

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1. Policy Statement

Clinigen Limited ("Clinigen") values its reputation and is committed to conducting business in an honest, ethical, and lawful manner. Speaking up about any concern you have at work is really important. In fact, it is vital because it will help us to keep improving.

You may feel worried about raising a concern, and we understand this. But please do not be put off. Our senior leaders and entire board are committed to fostering and maintaining an open and honest culture.

2. Purpose

The purpose of this Policy is to encourage employees to report concerns. Concerns include any potential misconduct relating to a failure to follow laws, regulations, or Clinigen policies, or failing to act consistently with Clinigen's commitment to honesty, ethical behaviour, and lawful conduct.

3. Scope

This Policy applies to all employees of Clinigen and Clinigen subsidiaries,, all of which are collectively referred to as employees. In addition, Clinigen expects that its business partners will meet the same standards of excellence.

4. Policy

4.1. What to Report and How

Employees should report concerns related to any employee and/or Clinigen business partner.

You can make a report to your direct supervisor, another supervisor, or any representative from Human Resources or the Legal, Compliance & ESG Department.

Whichever route you choose, please be ready to explain as fully as you can the information and circumstances that give rise to your concern.

4.2. Confidentiality

We hope you will feel comfortable raising your concern openly, but we also appreciate that you may want to raise it confidentially. This means that while you are willing for your identity to be known to the person you report your concern to, you do not want anyone else to know your identity. In that case, we will keep your identity confidential.

You can raise your concerns with any of the people listed in under 4.1 above, in person, by phone, or in writing (including email).

Alternatively, you can choose to raise your concern anonymously, without giving anyone your name, although that may make it more difficult for us to investigate thoroughly and give you feedback on the outcome.

Anonymous reports may be made at any time at

<https://clinigengroupplc.sharepoint.com/sites/AnonymousReport> or through the "[Make an Anonymous Report](#)" link found on the Legal, Compliance & ESG Department's SharePoint site.

Anonymous reports do not require you to identify yourself by name, position, or any other traceable information, but allow you to identify yourself if you so choose.

Confidentiality will be respected for anonymous reports to the extent permissible by law.

4.3. Reporter's Protection

If you raise a genuine concern under this Policy, you will not be at risk of retaliation whether that is losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of

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anyone raising a concern. Nor will we tolerate any attempt to bully you into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action.

Provided you are acting honestly, it does not matter if you are mistaken or if there is an innocent explanation for your concerns.

Under this Policy, retaliation is defined as an adverse action taken against an employee in response to the employee submitting a good faith report consistent with this Policy. Retaliation that can take various forms, including unfavourable work assignments, unfavourable performance reviews, threats, harassment, demotion, suspension, reduced compensation, denial of benefits, or termination, among others.

Any act or threat of retaliation will in itself be considered as serious violation of our values and subject to discipline up to and including termination.

4.4. How will we learn from your concern?

We will investigate the allegations raised under this Policy. The focus of the investigation will be to determine the facts as they occurred. Where the result of any investigation identifies improvements that can be made, we will track them to ensure necessary changes are made and are working effectively.

Lessons will be shared with teams across the organisation, or more widely, as appropriate.

4.5. Investigation and Outcome


We may decide that your concern would be better looked at under another process (for example, our process for dealing with bullying and harassment). If so, we will discuss that with you. Any employment issues (that affect only you and not others) identified during the investigation will be considered separately.

We will investigate and address all employees' reports in a timely manner. Investigations shall be conducted by Clinigen Legal, Compliance & ESG representatives and/or third-party investigators. We will treat you with respect at all times and will thank you for raising your concerns. We will discuss your concerns with you to ensure we understand exactly what you are worried about. Wherever possible and appropriate, we tell you what we have done to address your concerns (while respecting the confidentiality of others). If we conclude that an employee intentionally made a false report, the reporter may be subject to discipline up to and including termination.

4.6. Board oversight

The Board will be given high level information about all concerns raised by our staff through this Policy and what we are doing to address any problems. We will include similar high-level information in our annual report, as appropriate. The board supports staff raising concerns and wants you to feel free to speak up.

5. Document History

Change No.	Change Description (include previous Policy reference if available)	Effective Date
01	New controlled Policy	23 Nov 2022  <p>DocuSigned by: RR Signer Name: Rachel Rafferty Signing Reason: I approve this document Signing Time: 09-Nov-2022 10:11 AM GMT B4DB53D88B6A44518DC98B0CC814EDF0</p>

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