



Regional Whistleblowing Policy

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Version 00

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REGIONAL WHISTLEBLOWING POLICY

PURPOSE

At Lenis farmacevtika d.o.o. together with daughter companies and contractors (hereinafter referred to as Lenis) our values and expectations, patient focus, transparency, respect and integrity inform everything we do.

We are committed to fostering a culture of transparency, integrity, and accountability. This document outlines our processes for reporting breaches of the law, protecting whistleblowers from retaliation, and managing reports effectively.

Our commitment to living these values includes having a “speak up” culture by making it easy to call out conduct that could negatively impact upon our workplace and ensuring there is a safe and secure way for individuals to disclose serious misconduct. A strong whistleblower culture will help foster an ethical workplace environment.

This Policy aims to define the scope, procedures and reports prepared under this Policy if there is a reasonable ground to suspect that a Lenis officer, employee, contractor, supplier or other person with whom Lenis has business dealings (“Worker”) has engaged in activity that is reportable.

RESPONSIBILITIES

The senior management team is responsible and accountable for this Whistleblowing Policy and Procedure. They will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy,
- receive and review annual reports on whistleblowing activity,
- appoint designated officer/s.

Line managers are responsible for:

- ensuring all employees are aware of this policy, procedure and their responsibilities,
- investigating issues raised promptly and thoroughly,
- fostering an open culture within their teams,
- ensuring any whistleblower is not subject to detriment,
- escalating reports and engaging the support of designated officer/s where required.

Compliance Officer and its deputies are responsible for the whistleblowing procedure and the handling of irregularities raised. They will:

- oversee and review the whistleblowing policy and procedure,
- provide advice and support to managers and employees,
- ensure learnings from whistleblowing cases are fed back to the wider organisation,
- ensure managers are trained in dealing with issues,

- investigate issues raised with them directly, promptly and thoroughly,
- inform all reported disclosures to the senior management team and the actions being taken,
- ensure the process is monitored and improved where required,
- provide reports on whistleblowing activity on an annual basis to the senior management team.

All employees have a duty to report wrongdoing (whistleblow) if they notice reportable behaviour or activities set out below.

SCOPE

Scope of Application

This Whistleblowing Policy applies to:

- employees, including former employees,
- suppliers, consultants, contractors, and subcontractors,
- trainees, volunteers, interns, students and other workers under supervision,
- owners/shareholders and persons belonging to management or supervisory bodies,
- anyone with access to information on the company's activities who may encounter breaches.

What Can Be Reported

Report can include, but is not limited to:

- conflicts of interest,
- fraudulent activity,
- falsified data submissions,
- unethical behaviour including corruption, bribery or blackmail,
- financial irregularity, such as misleading reporting practices or an improper state of affairs,
- illegal activity, such as criminal damage, or failure to comply with the law,
- serious risks to public health or safety, such as a workplace or environmental hazard,
- other violations of law related to the internal market, consumer protection, personal data protection, competition rules, public procurement, etc.

PROCEDURE

Ways of Reporting

We encourage the use of internal channels for whistleblowing to ensure timely resolution. All reports will be handled confidentially and promptly.

Employees and other eligible whistleblowers can report suspected violations through the following channels:

Channels	Location	Reported to	Details
Internal Year-Long Anonymous Survey	Company-wide Teams channel LEN+MPH	Managing Director	Anonymous by default (settings), however the reporter can leave a name (optional)
External Whistleblower Portal	Link to a form on the company website www.lenis.si/our-policies	compliance@lenis.si	accessible to the Regional Business Compliance Officer and its Deputies
Dedicated E-mail	compliance@lenis.si		
By Post	Business Compliance Officer Lenis d.o.o., Litostrojska cesta 52, 1000 Ljubljana, Slovenia	Regional Business Compliance Officer	with a note "confidential"
In person	Regional Business Compliance Officer, its Deputies, HR or to any member of the management team		

Confidentiality and Anonymity

Confidentiality: The identity of the whistleblower, as well as the information provided, will be treated with the highest degree of confidentiality. The whistleblower's details will not be disclosed to any parties, except those directly involved in the investigation or with the whistleblower's express consent.

Anonymous Reporting: Whistleblowers may choose to remain anonymous. However, anonymity may limit the company's ability to investigate the report thoroughly.

Protection Against Retaliation

Any form of retaliation, whether direct or indirect, against whistleblowers is strictly prohibited. Retaliation includes but is not limited to:

- dismissal, demotion, or withholding of promotions,
- changes in job duties or workplace conditions that are unfavourable,
- harassment, bullying, or creating a hostile work environment,
- legal action or threats of legal action against the whistleblower.

Measures Against Retaliation: whistleblowers are entitled to confidentiality and protection against unfair treatment,

- any employee found to be engaging in retaliatory behaviour will be subject to disciplinary action, which could include dismissal,
- whistleblowers who suffer from retaliation may seek legal remedies or submit a claim to relevant authorities.

Process for handling whistleblower report

1) Acknowledgment of Report

Once a report is received, the whistleblower will receive an initial acknowledgment within **seven (7) days**.

2) Initial Assessment

The company's compliance team or designated officer will conduct an initial assessment to determine if the report is valid and within the scope of this policy.

3) Investigation

An investigation will be launched if the report is deemed valid. The investigation will be conducted by the compliance officer or a neutral third party if compliance officer is subject of the investigation. All investigations will be concluded within a reasonable time, typically **three (3) months**, with updates provided to the whistleblower (unless anonymity prevents this).

4) Corrective Action

If the investigation finds evidence of a breach, corrective measures will be taken immediately. These may include policy changes, disciplinary actions, or legal proceedings, depending on the nature of the breach.

5) Feedback and Follow-Up

Whistleblowers are entitled to receive final feedback on their report within **three (3) months** from the acknowledgment of receipt. Feedback may include the status of the investigation and any actions taken, subject to confidentiality and data protection laws.

Training and Awareness

All employees will receive regular training on whistleblowing procedures, their rights, and responsibilities under this policy. This ensures that all personnel understand how to report concerns and the protections available to them.

All other stakeholders will be informed about our whistleblowing policy through the Our policies section on the company website, as well as through contacts and contracts/agreements with them.

Legal Considerations and Compliance

This Policy will be regularly reviewed and updated to reflect any changes in legislation or company policy.

FINAL PROVISIONS

This rulebook can be amended in the same manner and according to the same procedure as it was adopted. The Rulebook comes into force upon signature by the employer and notification to employees and applies from 01 January 2025 onwards.



Managing Director:

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