

Speak Up Policy

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1. Introduction

1.1. Purpose and Objectives of the Speak Up Policy

Arcera is committed to fostering a culture of integrity, transparency, and accountability. The Speak Up Policy is a cornerstone of this commitment, providing a safe, structured, and confidential mechanism for employees and stakeholders to report Concerns related to actual or suspected misconduct, violations of law and regulations, or breaches of Arcera's Code of Ethics and integrity standards.

This Policy supports Arcera's commitment to ethical leadership and responsible business practices by ensuring that all individuals feel safe, supported, and protected when raising Concerns in good faith.

Objectives:

- Empower individuals to raise Concerns in good faith, without fear of retaliation, and with the assurance that their voices will be heard and respected.
- Provide clear, accessible, and secure reporting channels, including anonymous options, for employees, contractors, and third parties.
- Ensure timely, fair, and independent handling of reports, with investigations conducted professionally, confidentially, and on a need-to-know basis.
- Promote a culture of openness and accountability, where speaking up is encouraged, normalized, and supported by leadership.
- Protect Reporters who report Concerns in good faith, even if the report is ultimately unsubstantiated, while discouraging misuse of reporting mechanisms.
- Strengthen trust in Arcera's compliance framework by demonstrating responsiveness, transparency, and consistency in addressing Concerns.

This Policy is integral to Arcera's ethical foundation and supports our shared responsibility to maintain a workplace rooted in respect, fairness, and ethical excellence.

1.2. Related Documents

The Policy must be read and interpreted in conjunction with the following internal control documents:

Document Title
Code of Ethics 1.0
DP-POL-1 Privacy Policy
IC-POL-2 Anti-Bribery and Anti-Corruption Policy
IC-POL-3 Conflict of Interest Policy
PRO-I&C-1 Global Investigation Procedure

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1.3. Changes

This Policy may be subject to review at any time but at least on a bi-annual basis. The most current version of this Policy will always be available on Arcera's Intranet with other non-GxP control documents.

In case any control documents currently in effect conflict with any of the standards, principles or requirements set forth in this Policy, the terms of this Policy shall prevail.

2. Scope of Application

This Policy applies to Arcera, and all entities directly or indirectly controlled by it (collectively referred to as "Arcera"). It is binding on all Employees, directors, managers, and officers, including temporary, part-time, Third Parties' employees dedicated to Arcera business and contracted personnel, as well as External Service Providers who have access to Arcera's premises, systems, or act on its behalf.

Arcera recognizes that ethical Concerns may arise from interactions with External Stakeholders. Therefore, this Policy also extends to:

- Vendors and suppliers
- Distribution partners, logistics partners and wholesalers
- In-licensing partners
- Regulatory consultants
- Healthcare Professionals (HCPs)
- Patients and caregivers

These Third Parties as well as any TPIs are encouraged to report Concerns through Arcera's designated Speak Up channels.

3. Definitions

Abbreviation / Acronym / Term	Meaning of Abbreviation / Acronym / Term
ARC	Refers to Arcera Audit and Risk Committee.
Arcera	ARCERA LIFESCIENCES L.L.C- O.P.C. and any subsidiary or affiliated entity in which Arcera directly or indirectly holds a controlling interest or otherwise exercises operational control.
Board of Directors	Refers to Arcera board of directors, including the board chairperson.
caregivers	Individuals who provide direct care and support to patients, including family members, legal guardians, or professional care providers. In the context of Speak-Up, caregivers may be involved in or witness interactions relevant to patient safety, ethical conduct, or compliance Concerns.
Case	A reported concern or incident submitted through the Speak-Up Line or other reporting channels. Each Case is documented, assessed, and managed according to Arcera's investigation procedures, ensuring confidentiality, fairness, and timely resolution.

Concern	Any question or suspicion about any incident of Fraud, corruption or other unethical wrongdoing (involving either employees or external parties) that has occurred or may occur
Covered Person	Covered Person refers to all individuals who fall under the scope of the Policy and investigation process. This typically includes: - Employees (full-time, part-time, temporary, interns) - providers with access to Arcera systems or premises - Board members and senior management - External Stakeholders - External Service Providers - Any other stakeholders involved in or impacted by the concern Essentially, anyone who is subject to Arcera's Code of Ethics and compliance obligations and may be involved in or affected by a reported concern is considered a "covered person."
Disciplinary Action	An action taken against an employee to alert, correct behaviours, and/or deter them from future issues, violation, or instances of wrongful behaviour. Disciplinary Action may range from coaching, verbal and written warnings to termination and shall be in accordance with applicable local laws and regulations, as well as internal policies and procedures.
Employees	Refers to all personnel engaged by Arcera in a work capacity, including full-time, part-time, temporary, and fixed-term staff, contractors as well as interns and trainees. Only for the purpose of simplifying this Policy, this definition will also extend to consultants, secondees, third party employees working under Arcera's direct supervision or within its operational control, regardless of the duration or nature of their employment. Nothing in this Policy shall be interpreted to establish an employment relationship with third party employees.
External Service Providers	An External Service Provider is any third party, individual, or organization that is not employed by Arcera but is engaged to provide services or expertise and who work with an Arcera email address or are given access to our premises and/or IT systems. This includes, but is not limited to, consultants, contractors, agents, and other business partners who perform work or services on behalf of, or for the benefit of, Arcera.
External Stakeholders	An External Stakeholder refers to any individual or entity outside the organization that may have an interest in, be affected by, or interact with the company. This includes, but is not limited to, business partners, intermediaries, suppliers, customers, healthcare professionals (HCPs), patients, patient groups, caregivers, and other third parties. Engagement or direct business interaction is not required for someone to qualify as an external stakeholder. Any external stakeholder should be able to file a Speak Up report if they suspect wrongdoing or unethical behaviour.
Global Speak Up Committee	The Global Speak Up Committee is a cross-functional governance body that oversees the integrity and effectiveness of Arcera's Speak

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	Up framework. It ensures that all high-risk cases—and medium-risk cases when appropriate—are managed consistently, fairly, and in accordance with internal policies and applicable laws. Key responsibilities include: - Reviewing and approving investigation processes and outcomes - Endorsing remediation actions - Monitoring case resolution timelines - Ensuring follow-up on corrective measures It also serves as the central escalation and decision-making authority for complex or sensitive cases. For these complex and sensitive matters, the Committee coordinates closely with the Chief Executive Officer, the Global Compliance Committee, and relevant Executive Leadership Team members before escalation to ensure transparency and organizational accountability.
Healthcare Professionals (HCPs)	For the purposes of this Policy, a Healthcare Professional (HCP) is any member of the medical, dental, pharmacy, nursing, or allied health professions, or any other person who, in the course of their professional activities, may prescribe, recommend, purchase, supply, administer, sell or administer the use of an Arcera product. This definition excludes individuals whose responsibilities relate solely to procurement or purchasing activities at the national or governmental level (e.g., ministry of health officials, tender committee members). Such individuals should be treated solely as Government Officials.
Integrity & Compliance (I&C) (Regional or Global)	Integrity & Compliance is the Arcera function that has primary responsibility for the management of integrity and compliance matters.
Investigation	An investigation refers to the structured process of reviewing and analysing the factual, legal, and ethical aspects of a reported Concern. This may involve conducting interviews, examining relevant documents and data, performing site visits, and, where necessary, seeking advice from external experts. Investigations are conducted with discretion, impartiality, and in accordance with Arcera's Code of Ethics and internal policies, ensuring confidentiality and protection against retaliation for all involved parties.
Investigation Team	The Investigation Team is a designated group responsible for conducting fair, thorough, and confidential inquiries into reported concerns. This team may include representatives from various functions—such as Compliance, Legal, Environment, Health & Safety (EHS), People & Culture (P&C), and Finance—and may draw members from different locations, including Global and/or regional offices, depending on the nature and scope of the investigation. The team ensures adherence to company policies, legal requirements, and ethical standards throughout the process.

Patients	An individual receiving medical care, treatment, or support from healthcare professionals or organizations. Patients may be directly or indirectly impacted by business activities, clinical practices, or third-party interactions. In the context of the Speak-Up Policy, patients are considered key stakeholders whose safety, dignity, and rights must be protected, and whose Concerns or experiences may be relevant to compliance investigations or ethical reviews.
People & Culture (Regional or Global)	People & Culture is the Arcera function that has primary responsibility for the management of all human resource matters.
Policy	Refers to this Speak Up Policy.
Third Party	A Third Party is a person or organization supplying products or services to Arcera or buying products or services from Arcera. Third Parties are not part of, nor directly employed by Arcera. Typically, Third Parties do not represent or act on behalf of Arcera, nor are they integrated into Arcera's commercialization structure (e.g. a wholesaler that is purchasing and selling products entirely at their own risk and account). A Third-Party Intermediary (TPI), see definition below, is a special type of Third Party.
Third Party Intermediary (TPI)	A TPI is a company or individual that represents, interacts or transacts business with another Third Party on behalf of, or in the name of, Arcera. Examples include a distribution partner that has a sales force detailing Arcera's products to HCPs, a consulting company representing Arcera's interests in exchanges with a regulatory authority or another third party, or any other business partner that may be interacting with Government Officials or other third parties on Arcera's behalf. In contrast, see definition of Third Party.
Reporter(s)	An individual who raises a concern or reports suspected misconduct, unethical behaviour, or violations of laws, regulations, or company policies. Reporters may be employees, contractors, third-party partners, or other stakeholders. Arcera is committed to protecting Reporters from retaliation and ensuring that all Concerns raised in good faith are treated confidentially, investigated appropriately, and addressed in a timely and respectful manner.
Retaliation	Any adverse action taken against an individual for reporting a Concern or participating in an investigation in good faith. Retaliation can include, but is not limited to dismissal, demotion, denial of promotion, harassment, intimidation, exclusion, unjustified negative performance reviews, changes in duties or working conditions intended to punish, or threats and indirect pressure to withdraw a report.

4. Roles and Responsibilities

Role	Core Responsibilities
Covered Person	Covered Persons' responsibilities are: • Compliance with Policy: Understand and adhere to Arcera's Code of Ethics, Speak Up Policy, and all applicable laws and regulations. • Good Faith Reporting: Raise Concerns honestly and promptly through approved channels without fear of retaliation. • Confidentiality: Maintain strict confidentiality regarding reported Concerns and investigations; avoid discussing Cases with unauthorized parties. • Non-Retaliation: Respect Arcera's non-retaliation principle and avoid any actions that could intimidate or penalize reporters or participants.
Investigation Participant	An Investigation Participant — whether the subject of an investigation or a witness — is expected to fully cooperate with the investigative process. Their responsibilities include: - Availability: Ensure they along with relevant documents or records, are accessible to the Investigation Team. - Integrity: Refrain from destroying or altering documents, intimidating witnesses, or interfering with the investigation. - Truthfulness: Provide honest responses to all questions. - Proactivity: Share any information in good faith that may assist the investigation. - Non-Interference: Do not conduct any investigation independently or take any actions during or after reporting a Case. - Confidentiality: Maintain strict confidentiality regarding all aspects of the investigation, including its existence, involved parties, and facts. - Approval of recordings: Do not record interviews without prior written approval from the global Legal & I&C team. Approval must be obtained before any approved recordings begin. Failure to comply with these responsibilities may result in Disciplinary Action as per applicable laws and regulations, up to and including termination.
Investigation Team	The Investigation Team are global or regional members of the functions entrusted with the assessment, investigation and resolution of Cases (i.e., Integrity & Compliance, People & Culture, EHS, Medical, Finance, etc.) that are designated by the Global I&C Team as being necessary and appropriate contributors to the investigation process and have the skillset to contribute professionally, confidentially, and in alignment with Arcera's ethical standards and investigation procedures.
Managers and Supervisors	Managers and supervisors play a key role in creating a culture where people feel safe to speak up. They are expected to lead by example,

	promote ethical behavior, and encourage open communication. When a Concern is raised, they must take it seriously, handle it respectfully and confidentially, and escalate it through the proper channels. Managers and supervisors should act promptly and support anyone who raises a Concern, ensuring they are protected from retaliation.
Integrity & Compliance (I&C) (Global or Regional)	The Integrity & Compliance function is responsible for overseeing the Speak Up program and ensuring the Policy remains current and effective. This includes maintaining accessible and secure reporting channels, managing or coordinating investigations of reported Concerns, and ensuring all matters are handled with fairness and confidentiality. The team is also tasked with protecting Concerned Parties from any form of retaliation and monitoring trends and outcomes to support continuous improvement in the company's culture of integrity and accountability. Global I&C Team: • Responsible for the overall implementation, monitoring, and enforcement of this Policy • Oversight: Ensure Policy principles are respected across all regions and maintain governance of the Speak Up program. • Ensure reports risk levels are assessed against the risk matrix aligned with the GCC and ARC. • High-Risk Cases: Fully involved in all high-risk Cases from start to finish. • Medium-Risk Cases: Involved based on allegation category, potential impact on Arcera, and to ensure adherence to Policy principles. • Low-Risk Cases: Informed and consulted for guidance and support; not directly involved in investigation. • Regular Updates: Must remain updated on all Cases where they are not directly involved. Regional I&C Team: • Support local execution and ensure alignment with global standards. • Investigations: Lead investigations of low risk Cases independently and lead medium risk Cases in collaboration with global I&C team • Support Role: Assist the Global team in high risk Cases as requested. • Communication: Ensure timely updates to Global I&C on all Cases' progress and outcomes.
Global Speak Up Committee	The Global Speak Up Committee is responsible for ensuring consistent, fair, and policy-aligned handling of high-risk and, when appropriate, medium-risk Speak Up cases. Its key responsibilities include: - Approving investigation findings and root cause analyses for all high-risk cases and selected medium-risk cases.

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	- Endorsing remediation actions resulting from these investigations. - Following up on the implementation of approved actions to ensure timely and effective resolution. - Monitoring case status, including resolution timelines and compliance with internal standards and applicable local laws and regulations. - Tracking escalated cases to ensure accountability and timely closure. - Coordinating and aligning with the Chief Executive Officer, Global Compliance Committee, and relevant Executive Leadership Team members prior to any escalation or decision-making on highly sensitive cases, to maintain transparency and organizational accountability.
Integrity & Compliance Committee (Global, or Regional)	The Global Integrity & Compliance Committee plays a critical role in supporting the Global Speak Up framework through: - Oversight of the overall Speak Up program and its implementation. - Trend analysis of reported Cases to identify systemic issues and areas for improvement. - Monitoring program effectiveness, including reviewing metrics, Case outcomes, and remediation follow-through. - Approving new Speak Up Policy as well as any revised versions. - Being informed and consulted on relevant investigations, Policy updates, and strategic decisions. - Providing guidance and recommendations to strengthen the culture of integrity and compliance across the organization. The Regional Compliance Committee (RCC) may review and approve investigation outcomes and endorse recommended Disciplinary Actions, subject to the provisions outlined in the respective RCC charters and regional governance frameworks. This ensures that decisions are aligned with local regulatory requirements and organizational standards while maintaining consistency and fairness across regions. All high risk Cases shall be escalated to the Global Speak Up Committee for final approval. Medium risk Cases can be escalated to the Global Speak Up Committee on a need basis.
Audit and Risk Committee (ARC) / Board of Directors	The Audit and Risk Committee and the Board of Directors provide independent oversight of Arcera's Integrity and Compliance program, including the Speak Up program. They receive high-level information on individual Cases according to risk level, review reports on Speak Up activity to ensure appropriate follow-up, accountability, and alignment with Arcera's ethical standards. By championing a culture of transparency and ethical leadership at the highest levels, they reinforce Arcera's commitment to responsible business practices and uphold the trust placed in the company by its stakeholders.

5. Standards, Principles and Requirements

At Arcera, we are committed to fostering a culture of integrity, transparency, and accountability.

Arcera's Speak Up Policy is designed to comply with all applicable laws and regulations including whistleblower protection and data protection laws. Where local laws impose stricter requirements, those provisions shall prevail.

The following standards and principles guide how Concerns should be raised and handled under the Policy.

5.1. Commitment to Ethical Conduct

At Arcera, ethical conduct is not just a Policy; it is a fundamental expectation and a shared responsibility across all levels of the organization. Covered Persons are expected to act in accordance with Arcera's Code of Ethics, as well as all applicable laws, regulations, and internal policies.

Ethical behavior is the cornerstone of our business practices. It guides how we make decisions, interact with one another, and represent Arcera in the marketplace. Upholding these standards is essential to maintaining trust with our colleagues, patients, regulators, and communities.

Arcera fosters a culture where ethical conduct is recognized, supported, and expected. Leadership plays a critical role in modeling integrity, but every individual contributes to building and sustaining an ethical workplace. When in doubt, employees are encouraged to seek guidance from their line manager, People & Culture, or the Integrity & Compliance team.

5.2. Obligation to Speak Up

At Arcera, maintaining a culture of integrity depends on the active participation of everyone—Employees, External Service Providers and External Stakeholders alike. All individuals covered by this Policy have a responsibility to report their Concerns including any actual or suspected misconduct, unethical behaviour, or violations of Arcera's policies or legal obligations.

Speaking up is not only a duty, but also a proactive step toward protecting our people, our patients, and our reputation. Timely reporting allows the organization to address issues before they escalate, reinforce accountability, and uphold the standards that define who we are.

This obligation includes:

- Reporting Concerns even if you are not directly affected.
- Speaking up when you witness or suspect wrongdoing, regardless of the seniority of those involved.
- Using the appropriate channels to raise Concerns, whether anonymously or openly.

Arcera is committed to creating an environment where individuals feel safe and supported in raising Concerns. Silence can enable misconduct; speaking up helps prevent it.

5.3. Good Faith Reporting

Arcera is committed to fostering a culture of integrity and transparency. While the company encourages all stakeholders to report Concerns in good faith, it also recognizes the potential harm caused by deliberately false or malicious reports.

Arcera prohibits knowingly false or malicious reports. Where there is clear evidence of intentional falsification or abuse of the reporting system, appropriate disciplinary measures may be considered in accordance with applicable laws. However, individuals who report Concerns in good faith—regardless of the outcome—are fully protected from retaliation. This Policy does not tolerate any form of intimidation or deterrence against Reporters acting in good faith.

Arcera will ensure that any Disciplinary Action for false reporting is based on clear evidence of malicious intent or deliberate falsification. Investigations into suspected false reports will be conducted fairly and confidentially. The Integrity & Compliance Department in partnership with the People & Culture department will oversee enforcement and ensure alignment with local laws and international standards.

5.4. Confidentiality and Anonymity

Arcera is committed to protecting the identity and privacy of individuals who report Concerns under this Policy. Confidentiality and anonymity are essential to fostering a safe and trustworthy reporting environment, particularly in the pharmaceutical sector where sensitive information and regulatory obligations are involved.

All reports submitted through Arcera's Speak Up channels will be treated with strict confidentiality. Reporter identity will be protected and only disclosed when necessary to address the concern or as required by law or regulatory authorities. Information will be shared solely on a strict need-to-know basis with authorized individuals directly involved in investigating and resolving the matter.

Reporters may choose to report anonymously via Arcera's secure online platform or hotline. Anonymous reports will be investigated with the same rigor as identified reports, although follow-up may be limited. Arcera encourages anonymous reporters to retain their Case reference number and access credentials to enable secure follow-up communication.

Arcera is applying appropriate technical and organizational security measures to protect Reporter identity and data.

There are some limited situations where Arcera may not be able to comply fully with your request as a Reporter to remain anonymous including but not limited to Cases where we need to engage external legal counsel to obtain legal advice; or we use a specialist external investigator; or where a mandatory disclosure to a regulator or ab authority is required under

legislation. Arcera will inform the Reporter in advance if such disclosure becomes necessary, to the extent permitted by law.

5.5. Non-Retaliation

Arcera is committed to maintaining a culture where individuals feel safe and supported when raising Concerns. We strictly prohibit any form of retaliation against anyone who, in good faith, reports a concern, participates in an investigation, or seeks guidance on ethical matters.

No employee, External Service Provider or External Stakeholder who assist in preparing or submitting a report will suffer adverse consequences for:

- Raising concern through the Speak Up platform or other approved channels
- Cooperating in an investigation
- Refusing to participate in unethical or illegal conduct.

These individuals are equally protected against any form of retaliation. This protection applies even if the concern is ultimately unsubstantiated, provided it was raised in good faith.

All forms of retaliation are considered a serious violation of Arcera's Code of Ethics and may result in Disciplinary Action in accordance with local laws and regulations, up to and including termination of employment or contract.

If you believe you have experienced or witnessed retaliation, you are encouraged to report it immediately through the Speak Up platform or directly to the Integrity and Compliance team. All retaliation reports will be reviewed promptly following report receipt, investigated and handled with the same level of confidentiality and care as any other concern.

5.6. Misuse of the Speak Up Process

Arcera is committed to fostering a culture of integrity, transparency, and trust. The Speak Up process is a vital mechanism for reporting Concerns related to misconduct, unethical behaviour, or violations of company policies. While we encourage all employees and stakeholders to use this process responsibly, misuse of the Speak Up process including any breach of confidentiality will not be tolerated.

The Speak Up process is not designed to handle employee grievances (see Section 6.1 infra for examples of grievances). The Company maintains other avenues for raising and addressing grievances. Employees are encouraged to direct grievances to one of their managers, or to the relevant People & Culture team.

6. Raising a concern

At Arcera, we believe that maintaining a culture of integrity and accountability requires everyone to speak up when something doesn't seem right. You are encouraged to raise a Concern whenever you reasonably believe that a violation of law, regulation, company Policy, or ethical standards may have occurred—or is at risk of occurring.

6.1. When to Raise a Concern

You should raise a Concern if you:

- Witness or suspect misconduct or wrongdoing.

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- Observe behavior that compromises safety, security, or the well-being of employees, patients, caregivers, or third parties.
- Identify actual or potential violations of Arcera policies.
- Notice irregularities in financial reporting, procurement, or business operations that may indicate unethical or unlawful practices.
- Feel pressured to act against your ethical judgment or company values.
- Are unsure whether a situation is appropriate and needs guidance or clarification.

You do not need to have all the facts or be certain that wrongdoing has occurred. If you have a genuine Concern or a reasonable suspicion, it is appropriate to raise it. Reports made in good faith are protected under Arcera's non-retaliation principle, even if the concern turns out to be unfounded after investigation.

Concerns may relate to, but are not limited to the following (in each case with actual or suspected):

- Financial crime and accounting irregularities (i.e. matters which may relate to accounting & auditing matters, accurate books and records, billing and coding, regulatory or internal banking controls, securities law violation, prohibited transactions/sanctions).
- Fraud, theft and the offering or acceptance of bribes (i.e. matters which may relate to anti-kickback, embezzlement, falsification of contracts, reports, or records, fraud (by an employee, member, provider, using company property for personal gain).
- Healthcare-Specific Risks including pre-approval or off-label promotion, clinical trial misconduct, bribery of HCPs.
- Competition law issues (i.e. matters which relate to agreements or conduct that have the potential to restrict competition e.g. price fixing, customer or market allocation, limiting production, bid rigging, exchange of sensitive information etc. and an abuse of a dominant position, on e.g. enforcing inappropriate terms etc. Please refer to the Competition Policy for the range of conduct and situations that may give rise to competition law issues.
- Environmental infractions or crimes; or breaches of our standards and processes which may constitute a security vulnerability constituting a risk for employees' or patients' health or safety.
- Undisclosed conflicts of interest compromising Arcera's best interests.
- Harassment or discrimination.
- Violations of Arcera's Code of Ethics, Global Anti-Bribery and Anti-Corruption Policy, . Privacy Policy,
- Environment, Health, and Safety (EHS) Policy or other company policy.

Topics generally not covered are:

- Adverse events and Pharmacovigilance reporting, which should be channeled to the Pharmacovigilance reporting line (Check with your local Pharmacovigilance representative for the correct reporting line).
- Data privacy reporting including data breaches which should be channeled to the data protection reporting line (privacy@arceralifesciences.com). If a data breach is reported to Speak Up line or a Case concerns privacy, Head of Privacy shall be involved in the

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investigation. If a data breach reported to Privacy Team contains any reportable wrongdoings under Speak Up Policy, Head of Privacy will submit a report on the Speak Up platform.

- Examples of privacy incidents and data breaches reportable to the Privacy Team:
 - ✓ Unauthorized access or disclosure of personal data
 - ✓ Accidental sharing or exposure of personal data
 - ✓ Loss or theft of a device/media containing personal data
 - ✓ Cyberattacks and hacking incidents involving personal data
 - ✓ Unauthorized modification or deletion of personal data records
 - ✓ Third-party or vendor incidents involving personal data (e.g. a vendor handling payroll or patient data experiences a data breach)
 - ✓ Paper based or physical data breaches (e.g. hard copies left unattended or disposed insecurely).
- Grievances related to workplace decisions, interpersonal conflicts, or management practices should generally be addressed through People & Culture.
 - Examples of grievances include:
 - ✓ Disagreement with a performance evaluation or feedback from a colleague or line manager.
 - ✓ Concerns about workload distribution or task assignments.
 - ✓ Perceived unfairness or inconsistencies in recruitment, promotion, compensation, employment benefits, or career development decisions.
 - ✓ Issues related to team dynamics, communication, or managerial style.
 - ✓ Requests for flexible working arrangements or accommodation, or employment benefits that were denied.
 - ✓ Feeling excluded from meetings or decision-making processes without clear justification.

If at any point a grievance reveals or escalates into a potential ethical or compliance issue—such as harassment, retaliation, or discriminatory behavior—or the concern involves a member of the People & Culture team or a global, regional or divisional leadership team member or the reporter wishes due to fear of retaliation to remain anonymous, it should be reported through the Speak Up channels. These cases will be investigated in partnership with People & Culture or handled confidentially when appropriate.

6.2. What to Include in a Report

To ensure that Concerns raised through the Speak Up process can be assessed and investigated effectively, it is important to provide sufficient and relevant information. A well-documented report helps the Integrity & Compliance team understand the nature of the issue, determine its seriousness, and take appropriate action.

When submitting a report, please include the following details where possible:

- A clear description of your concern
- Names of individuals involved (if known)
- Dates, locations, or relevant context
- Any supporting evidence or documentation
- Your Contact Information (Optional)

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- Whether you are comfortable being contacted for follow-up.

Remember: As a Reporter, you do not need to have every detail or conclusive evidence to raise a Concern. What matters most is that your report is made in good faith—based on a genuine belief that something may be wrong. Even if the Concern turns out to be unsubstantiated, good faith reports are always valued and protected under Arcera’s non-retaliation principle. Reporters must not attempt to investigate or verify allegations on their own. To preserve the integrity of the investigation and ensure confidentiality, reporters should refrain from discussing any open Case with colleagues or third parties. All information will be handled on a strict need-to-know basis by the Integrity & Compliance team.

6.3. How to Raise a Concern

If you wish to report a concern that aligns with the types of issues described above, you are encouraged to submit an online report via the Arcera Speak-Up platform at:

arcera.ipm.eu.starcompliance.com

The Arcera’s Speak Up platform allows for confidential or anonymous reporting, is available 24/7 and can be accessed by both internal and external parties. All reports are handled with care, discretion, and a commitment to fair treatment.

The platform is accessible only to select members of the Global I&C Team and the Investigation Teams. Each Investigation Team only has access to the reports/cases to which they were assigned by the Global I&C Team. All reports are initially reviewed and evaluated by select members of the Global I&C Team.

Depending on the nature and geographic scope of the Concern, the Global I&C Team will assign an Investigation Team.

Once your report is submitted, you will receive a Username and PIN. Please save this information securely, as it will be required to log back into the platform to:

- Track the progress of your report,
- Receive updates, and
- Submit additional information if needed.

Additional Guidance:

- You are encouraged to provide all relevant details and documentation at the time of submission.
- If new information becomes available later, you can log back into the platform using your Username and PIN to update your report.
- The platform supports multiple languages and offers instant translation between them, allowing you to submit your report in the language you are most comfortable with.

Alternatively, Reporters may submit a concern through dedicated hotlines (phone lines) available in selected countries. These hotlines are accessible in multiple languages, depending

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on the country selected, offer a confidential and secure way to report Concerns, and are toll-free so long as the individual is calling from the country in which the hotline is located.

The Speak Up platform and hotlines are managed by a third-party service provider to ensure anonymity, impartiality and confidentiality.

When submitting a verbal report via a hotline, the assigned agent will log the Case on the Speak Up platform and provide the reporter with a unique Case number and login details for secure follow-up. Reporters may use these credentials to check updates and share additional information, rather than contacting the hotline again.

In addition to using the Speak-Up Line or country-specific hotlines, Reporters may also consider raising their concern directly with their line manager, supervisor or Functional head, People & Culture representative, or a member of the Integrity & Compliance team. These internal channels can provide guidance, support, and help determine the most appropriate course of action.

Regardless of the reporting method chosen, Arcera is committed to protecting Reporters from retaliation and ensuring that all Concerns are handled with professionalism and discretion.

6.4. What Happens After You Report a Concern

Arcera is committed to ensuring that every Concern raised through the Speak-Up process is handled with professionalism, fairness, and confidentiality. Once a report is submitted, the following steps outline what you can expect:

- Acknowledgment – Confirmation of report receipt.
- Assessment – Initial review to determine sufficiency, credibility, good faith, legitimacy, scope and urgency (see Section 7.1 *infra*).
- Assignment – Case given to an appropriate, impartial Investigation Team.
- Investigation – Conducted fairly and in line with procedures, resulting in findings.
- Resolution – Actions taken based on findings.
- Closure – Case closed, and feedback provided where appropriate and as per local laws and regulations.

6.4.1. Acknowledgment of Receipt

Concerns submitted through the Speak-Up Line or other Reporter channels described above will be acknowledged, provided the Reporter has included contact details. Anonymous reports are still accepted and investigated, but acknowledgment may not be possible without a way of contacting the reporter.

6.4.2. Escalation by Management

If a Concern is raised directly with a manager, supervisor, or departmental head who identifies the Concern as a reportable matter, it is their responsibility to guide the reporter to submit a Case on the one of the channels described above or to escalate the concern to the Head of Integrity & Compliance without delay. This ensures that all Concerns are assessed consistently and appropriately.

6.4.3. Fair and Confidential Investigation

Once received through the above channels, the Concern will be evaluated to determine whether it qualifies as a Case under Arcera's investigation standards. If so, it will be investigated in accordance with Section 7 of this Policy. Investigations are conducted:

- Fairly and objectively.
- With respect to all individuals involved.
- In strict confidence, with information shared only on a need-to-know basis.

If the Reporter has provided contact details, the Investigation Team may reach out for additional clarification or supporting information to aid the investigation.

6.4.4. Conflict of Interest in Case Handling

To uphold the integrity and impartiality of the investigation process, any report that involves a member of the Global Integrity & Compliance (I&C) team will be automatically redirected to an independent investigation team.

This team will:

- Be composed of individuals with no direct reporting lines or personal affiliations to the subject of the report.
- Manage the Case in a confidential, fair, and objective manner.
- Follow the same standards and procedures outlined in the global Investigation Procedure, ensuring consistency and transparency.
- Coordinate with the CCSO only for administrative purposes, without disclosing sensitive Case details unless required for escalation or resolution.

6.4.5. Updates and Outcome

In addition to an acknowledgment, the Investigation Team may on occasion provide Reporters with general updates on the progress and/or outcome of the investigation. However, there may be valid reasons for not providing updates and feedback may be limited if sharing such information could compromise the integrity of the investigation, violate confidentiality, or breach local laws and regulations.

7. Investigation Process Overview

Arcera is committed to conducting investigations with professionalism, fairness, and integrity. Once a concern is raised through the Speak-Up Line or other approved channels, the following steps outline how it is assessed, investigated, and resolved.

7.1. Evaluation and Case Assessment

Every report submitted through the above channels (Speak Up Platform or the hotlines) is initially reviewed by the Global Integrity & Compliance Function to determine whether it qualifies as a Case—one that warrants formal investigation. A report is considered a Case if it:

- Contains sufficient detail and specificity to enable an investigation.
- Appears credible, meaning the facts raised are consistent, current and accurate.
- Is submitted in good faith, meaning there is no evidence of ill motive or bias.

- Raises a legitimate issue under Arcera's Code of Ethics or applicable laws (i.e., is not a grievance that should be addressed by another means, or the reported concern has undergone a prior investigation and no new or material Concerns have emerged).

If a report does not meet these criteria, it may be redirected to another function or closed with appropriate documentation.

7.2. Case Registration and Team Assignment

Once a report is deemed a Case, it is registered in the Speak-Up Platform. A dedicated Investigation Team is assigned as a first step.

As the second step, Investigation Team shall decide on one or several required options about whether the Case should:

- become the subject of an independent inquiry and investigation.
- be shared with the Global Speak Up Committee, the Global or Regional compliance committees and Leadership Teams, the Audit and Risk Committee, our external auditors, Compliance Department of our shareholder where applicable and/or any external regulatory or enforcement body (e.g., Abu Dhabi Accountability Authority).
- be referred to as an independent auditor or an external advisor (e.g., an external law firm or forensic accountant).

All Cases reported or referred to the above entities shall be aligned with applicable data privacy requirements to ensure anonymity and compliant personal data processing in accordance with applicable laws and regulations.

7.3. Investigation Planning and Execution

The Investigation Team develops a tailored plan, which may include document collection, interviews, risk assessment, and engagement of external experts. Investigations follow a hypothesis-based approach, testing theories against evidence. All evidence is handled with care, confidentiality, and proper documentation.

7.4. Interviews

Interviews are conducted respectfully and professionally, with attention to preparation, confidentiality, and accuracy. Investigation Participants who are interviewed may review and comment on interview minutes as well as be requested to sign the interview minutes along with the members of the Investigation Team who conducted the interview based on risk level associated with each Case. Interpreters are provided when needed.

7.5. Conclusion and Resolution

At the end of the investigation, the Case is concluded and documented with findings (e.g., substantiated, unsubstantiated, partially substantiated) and root causes, and remediation actions are proposed. High-risk Cases, as well as certain medium-risk Cases, Disciplinary Action are presented to the Speak Up Committee for final approval.

7.6. Post-Investigation Actions

Following resolution, relevant stakeholders may be informed, if and as appropriate, and with personal data redacted as appropriate and necessary. Remediation actions are assigned and tracked to completion. For employees under a third-party business partner's legal entity, any actions or disciplinary measures that involve external escalation—particularly those related to criminal matters requiring police or court involvement—must be referred to the business partner. This ensures compliance with local legal obligations and proper governance.

All relevant documentation is securely stored on the Speak-Up Platform.

8. Investigation Timelines

Arcera is committed to investigating Concerns as promptly and thoroughly as possible. The duration of an investigation may vary depending on the complexity and seriousness of the concern, the availability of relevant information, and the need for translation or external expertise.

- Investigations will be initiated without undue delay and conducted in a timely manner.
- In Cases requiring external advisors (e.g., legal counsel, forensic experts), the timeline may be extended to ensure a comprehensive and legally sound review.
- Where translation of documents or interviews is necessary, additional time may be required to ensure accuracy and fairness.

In jurisdictions where specific legal deadlines apply, particularly those affecting the implementation of Disciplinary Actions, the Investigation Team must liaise early with the relevant Legal and People & Culture teams. This coordination ensures that all applicable legal requirements are identified and respected from the outset of the investigation.

9. Training and Awareness

Arcera is committed to fostering a culture of integrity and transparency by ensuring employees are aware of their rights and responsibilities under the Speak Up Policy.

On an annual basis, all Arcera employees receive a Code of Ethics training that incorporates information on the Speak Up Program, platform and process. All employees are required to read and acknowledge the Policy as part of their onboarding.

Awareness will be promoted through targeted initiatives such as training sessions, internal communications, and company-wide campaigns.

On the Arcera intranet, employees can find the platform link, hotline numbers, and guidance on how to use the reporting system to raise a concern. The platform link is also published on the Arcera internet site, for easy access for external stakeholders.

10. Data Protection & Privacy

Reports submitted through the Arcera Speak-Up Line may contain personal data, even when submitted anonymously. This includes information that directly or indirectly relates to an

identified or identifiable individual—such as the reporter, the subject of the report, witnesses, or other affected parties.

Arcera will only process personal data that is relevant and necessary for the purpose of investigating and resolving the concern. Any superfluous or unrelated personal data will not be processed.

Sensitive personal data—such as information about race, ethnicity, political opinions, religious beliefs, trade union membership, health status, or sexual orientation – shall not be processed, unless it is directly relevant to the investigation (e.g., in Cases involving discrimination based on political affiliation).

Arcera acts as the data controller for all personal data collected through the Speak-Up process and is responsible for ensuring that such data is handled in accordance with applicable data protection laws and regulations.

Personal data collected through the Speak-Up process will be used solely for the purpose of managing and investigating reported Concerns and addressing any confirmed misconduct. Arcera applies both technical and organizational safeguards to protect personal data and ensures that access is restricted to individuals directly involved in the investigation.

Where necessary and legally permissible, personal data may be shared with:

- Relevant internal departments (e.g., P&C, Legal, Compliance).
- Senior management, the Board of Directors, or Compliance Committees.
- External parties such as law enforcement authorities, forensic experts, or independent auditors.
- Arcera affiliates or joint venture partners, if required for the investigation.

Any individual may request that Arcera rectify, block, or delete personal data that is inaccurate or processed unlawfully. Arcera will review and respond to such requests in accordance with legal obligations. Requests should be directed to privacy@arceralifesciences.com, with a copy sent to the Integrity & Compliance team.

11. Recordkeeping and Reporting

Arcera will retain all reports and related personal data only for as long as necessary to fulfill the purpose of investigating compliance Concerns and documenting adherence to applicable laws. If local legislation requires a longer retention period, the longest applicable duration will prevail.

General principles:

- Only relevant personal data is kept.
- Data is not retained longer than necessary to manage and resolve a report, including any judicial or Disciplinary Actions.

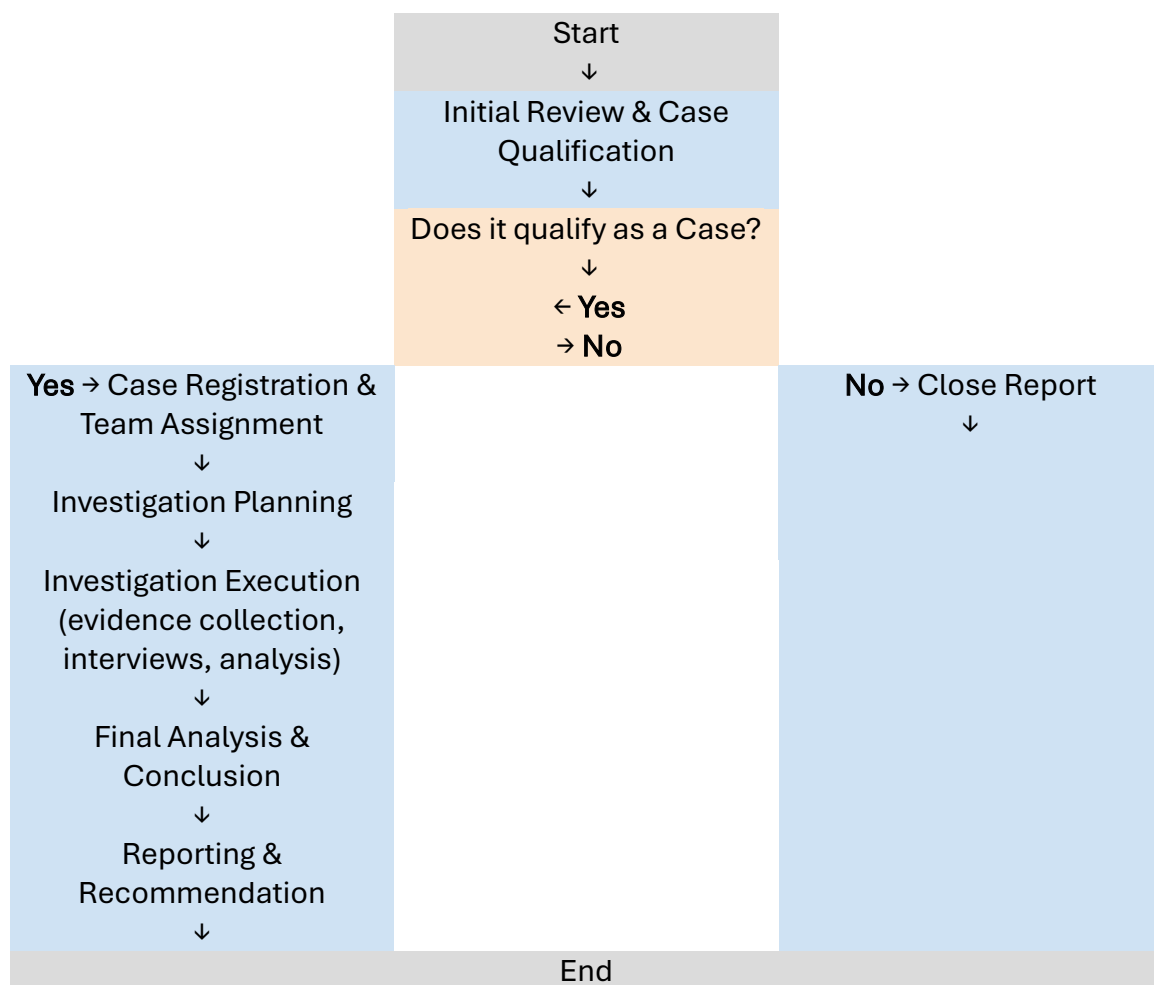
Retention periods:

- Irrelevant reports or data: Archived immediately and deleted within five (5) years from investigation closure.

- Reports without judicial/Disciplinary Action: Deleted within five (5) years after the verification/investigation phase.
- Reports leading to litigation or disciplinary measures: Retained until all statute of limitation periods have expired.

Summary data, KPIs (e.g., number of Cases, resolution time, retaliation incidents) and trends are reviewed periodically by the Integrity and Compliance team and, where appropriate, escalated to the Speak Up Committee and/or the Audit and Risk Committee and to any relevant regulatory body or entity as required to ensure transparency and accountability.

Appendix 1 – Investigation Workflow



Appendix 2 – Arcera Speak Up Hotlines¹

Country	Hotline Number
Brazil	0800 900 0133
Mexico	800 681 6961
South Africa	+27 87 232 5429
Switzerland	0800 564 968
UAE	800 06512077
Ukraine	+380 89 324 0484
Turkey	0800 621 2269

¹ The Egypt hotline is currently being finalized and will be included in the next Policy update.