

Syneos Health Speak-Up Policy & the EU Whistleblowing Directive:

Country Specific Supplements

The EU's Whistleblowing Directive sets out the protections that apply to those that report wrongdoing that they have become aware of in the course of their employment. Each EU country has adopted their own legislation to implement the Directive and as a result there are aspects of the reporting process and protections that differ between regions.

The links below will take you to the country specific supplements that should be read alongside the Company's Speak-Up Policy when utilising the Ethics Hotline for breaches in EU countries.

- [Austria](#)
- [Belgium](#)
- [Bulgaria](#)
- [Croatia](#)
- [Czech Republic](#)
- [Denmark](#)
- [Estonia](#)
- [Finland](#)
- [France](#)
- [Germany](#)
- [Greece](#)
- [Hungary](#)
- [Ireland](#)
- [Italy](#)
- [Latvia](#)
- [Lithuania](#)
- [Netherlands](#)
- [Poland](#)
- [Portugal](#)
- [Romania](#)
- [Slovakia](#)
- [Spain](#)
- [Sweden](#)

Document Type: Policy Supplement		
Owning Function:	Legal	Document Number and Version: 1
Applicable Location(s):	All EU countries with less than 50 Associates	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in the Applicable Locations pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in the Applicable Locations (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company, volunteers or interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations.

3. Definition of whistleblower

A whistleblower is defined as "a natural person who reports or publicly discloses information on breaches acquired in the context of his or her work-related activities". Breaches means acts or omissions that are unlawful and relate to the European Union acts, the financial interests of the European Union or the internal market.

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy. In some applicable locations, breaches of local laws will also fall within the scope of these definitions.

However, the disclosure of facts, information or documents relating to the protection of classified information, legal and medical privilege, judicial deliberations and rules of criminal procedure is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.

4. Reporting Channels

The whistleblower can choose between:

- (i) internal reporting to the Syneos Health group,
or
- (ii) external reporting to the central reporting channel (see paragraph 4.2.1), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable period following receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

4.2.1. Reporting to the Central Reporting Channel

Each Applicable Location will have its own central reporting channel for external reports. A list of the central reporting channels that have been established to date is available via the link below:

<https://www.navex.com/en-us/how-to-file-whistleblower-report-eu/>

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

The following are examples of acts and omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

Each Applicable Location will determine the support measures that will be provided to whistleblowers. Details of the support should be made available via the central reporting channel in the region or the competent authorities where applicable.

7. Forms and templates

None

8. References

<https://www.navex.com/en-us/how-to-file-whistleblower-report-eu/>

9. Appendices

None

10. Revision history

None

Document Type:	Policy Supplement	
Owning Function:	Legal	Document Number and Version: 1
Applicable Location(s):	Belgium	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Belgium pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Belgium (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company, volunteers or interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Belgium.

3. Definition of whistleblower

A whistleblower is defined as "a person who reports information about breaches or makes them public". Breaches in this context includes breaches of European Law as specified in the Whistleblowing Directive and instances of tax or social fraud.

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

4. Reporting Channels

The whistleblower can choose between:

- (i) internal reporting to the Syneos Health group,
- or
- (ii) external reporting to the Federal Ombudsman (see paragraph 4.2.1), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable period following receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

4.2.1. Reporting to the Federal Ombudsman

The Federal Ombudsman's Centre for Integrity examines **whistleblowers' reports** of integrity violations and breaches of law in the workplace.

The Federal Ombudsman is required to acknowledge receipt of the report within seven days and provide feedback within three months or, in complex cases, six months from the date of acknowledgement.

Further information about the reporting process is available via the link below:

<https://www.federaalombudsman.be/en/centre-for-integrity/whistleblowers>

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family

members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

Belgian law sets out an extensive list of acts or omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

The Federal Institute for Human Rights can provide the following support to whistleblowers:

- Psychological, social, technical and media support;
- Legal assistance in criminal or civil proceedings;
- Financial assistance in legal proceedings.

Further information about the available support is available via the link below:

<https://www.federaalombudsman.be/en/whistleblowers/support-for-whistleblowers>

7. Forms and templates

None

8. References

<https://www.federaalombudsman.be/en/centre-for-integrity/whistleblowers>

<https://www.federaalombudsman.be/en/whistleblowers/support-for-whistleblowers>

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Bulgaria	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Whistleblower Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Bulgaria pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Bulgaria (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company, volunteers or interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Bulgaria.

3. Definition of whistleblower

A whistleblower is defined as a person who "report or publicly disclose information about breaches of Bulgarian legislation or of European Union acts, which threaten or harm the public interest."

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

4. Reporting Channels

The whistleblower can choose between:

- (i) internal reporting to the Syneos Health group,
- or
- (ii) external reporting to the Bulgarian Personal Data Protection Commission (see paragraph 4.2.1), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised at a suitable time agreed between the parties.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channel

4.2.1. Reporting to the Personal Data Protection Commission

The Personal Data Protection Commission is appointed as a central external whistleblowing body. A form for registering reports is available via the link below:

https://www.cdpd.bg/en/index.php?p=sub_rubric&aid=282

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

Bulgarian law sets out an extensive list of acts and omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative

performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

The competent authorities can provide free comprehensive and independent information and advice on available procedures and remedies, on protection against reprisals and on the rights of whistleblowers.

7. Forms and templates

None

8. References

https://www.cdpd.bg/en/index.php?p=sub_rubric&aid=282

9. Appendices

None

10. Revision history

None

Druh dokumentu / Document Type:	Dodatek k zásadám / Policy Supplement		
Owning Function:	Právní oddělení/Legal Department		
Applicable Location:	Česká republika/Czech Republic	Datum účinnosti / Effective Date:	01.. 2024
1. Shrnutí	1. Summary		
<p>Cílem tohoto Dodatku k zásadám je doplnit stávající globální zásady pro oznamování porušení práva (Global Speak-Up Policy) (dále jen „Globální zásady“) o konkrétní legislativní změny, které byly v České republice zavedeny v souladu se směrnicí EU 2019/1937 o ochraně osob, které oznamují porušení práva Unie (směrnice o whistleblowingu), a místními právními předpisy.</p> <p>Tento dodatek k zásadám se proto zabývá rozdíly v uplatňování oproti Globálním zásadám, které platí v subjektech společnosti Syneos Health se sídlem v České republice (dále jen „společnost“).</p>	<p>This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the Global Policy) by addressing the specific legislative changes that have been implemented in the Czech Republic pursuant to EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive) and local legislation.</p> <p>This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health’s entities located in the Czech Republic (the “Company”).</p>		
2. Oblast působnosti	2. Scope		
<p>Tento Dodatek k zásadám se vztahuje nejen na všechny vedoucí pracovníky, ředitele, zaměstnance a dočasné pracovníky (společně dále jen „spolupracovníci“) a na všechny zástupce společnosti, zejména dodavatele, konzultanty a zástupce (společně dále jen „přidružené osoby“), ale rovněž na:</p> <ul style="list-style-type: none"> • akcionáře a držitele hlasovacích práv na valné hromadě společnosti, • členy správního, řídicího nebo dozorčího orgánu společnosti, • externí a příležitostné pracovníky společnosti, • spoludodavatele společnosti a jejich subdodavatele, • dobrovolníky a stážisty, • ty, kteří nahlásí nebo zveřejní informace o porušení, které získali během pracovního poměru se společností, který mezitím skončil, a • ty, jejichž pracovní poměr se Společností teprve začne, v případech, kdy informace o porušení získali v rámci výběrového řízení nebo jiných předmluvních jednání v České republice, • strany smlouvy o poskytování služeb nebo zboží Společnosti. 	<p>This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:</p> <ul style="list-style-type: none"> • shareholders and holders of voting rights in the Company's general assembly; • members of the Company’s administrative, management or supervisory body; • external and occasional staff of the Company; • co-contractors of the Company and their subcontractors; • volunteers or interns; • those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and • those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in the Czech Republic; • parties to a contract to supply services or goods to the Company. 		
3. Definice oznamovatele	3. Definition of whistleblower		
<p>Oznamovatel je vymezen jako „fyzická osoba, která oznámí možné porušení, k němuž došlo, nebo má teprve dojít a které má znaky trestného činu nebo přestupku nebo porušuje právní předpisy o</p>	<p>A whistleblower is defined as "a natural person who notifies of a possible infringement that has occurred or is about to occur and has the characteristics of a criminal offence or misdemeanor or violates</p>		

<p>whistleblowingu nebo jiný právní předpis nebo finanční zájem Evropské unie nebo jejího vnitřního trhu“.</p> <p>Takové informace budou podle Globálních zásad považovány za „nahlášenou událost“ nebo „účetní nahlášenou událost“.</p> <p>Zveřejnění skutečností, informací či dokumentů, které by mohly ohrozit národní bezpečnost, týkají se činnosti zpravodajských služeb nebo jejichž oznámení by představovalo porušení povinnosti zachovat mlčenlivost duchovních při výkonu zpovědního tajemství, je však zakázáno a nebude spadat do působnosti Globálních zásad ani tohoto Dodatku k zásadám..</p>	<p>whistleblowing law or another legal regulation or financial interest of the European Union or its internal market."</p> <p>Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.</p> <p>However, the disclosure of facts, information or documents that could threaten national security, relates to activities of the intelligence services or the notification of which would constitute a violation to maintain the confidentiality of the clergy in the exercise of confessional secrecy is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.</p>
<p>4. Kanály pro oznamování</p>	<p>4. Reporting Channels</p>
<p>Oznamovatel si může vybrat mezi dvěma typy oznámení:</p> <p>(i) interní hlášení skupině Syneos Health, nebo</p> <p>(ii) externí hlášení ministerstvu spravedlnosti (viz bod 4.2.1), přímo příslušnému orgánu nebo soudu či evropskému orgánu.</p>	<p>The whistleblower can choose between two types of reporting:</p> <p>(i) internal reporting to the Syneos Health group, or</p> <p>(ii) external reporting to the Ministry of Justice (see paragraph 4.2.1), directly to the competent authority or the courts or a European body.</p>
<p>4.1 Interní kanál pro oznamování</p>	<p>4.1. Internal reporting channel</p>
<p>Oznamovatelé spadající do oblasti působnosti vymezené v bodě 2 budou moci podávat interní hlášení (nahlášené události nebo účetní nahlášené události, jak jsou vymezeny v Globálních zásadách) prostřednictvím globálního kanálu uvedeného v Globálních zásadách. Doporučuje se podávat oznámení prostřednictvím interního kanálu, aby bylo možno záležitost řešit rychle a účinně.</p> <p>Interní postup umožňuje oznamovatelům podat oznámení jakýmkoli způsobem (písemně nebo ústně) určené kompetentní osobě společnosti: Vedoucí pracovník pro dodržování předpisů (complianceandethics@syneoshealth.com)</p> <p>Pokud se oznámení podává ústně, lze tak učinit telefonicky nebo prostřednictvím jiného hlasového systému, nebo pokud o to oznamovatel požádá, měla by být do 14 dnů dohodnuta videokonference nebo osobní schůzka.</p> <p>Společnost zajistí důvěrnost osobních údajů, které oznamovatel sdělí, a při vyřizování oznámení bude postupovat v souladu se zásadami ochrany údajů skupiny.</p> <p>Oznamovatel bude písemně informován o přijetí oznámení do sedmi dnů od jeho obdržení, pokud nepožádal, aby mu potvrzení zasláno nebylo, nebo pokud by to odhalilo jeho totožnost.</p> <p>Společnost do 30 dnů ode dne obdržení nahlášení posoudí jeho opodstatněnost a písemně oznámí</p>	<p>Whistleblowers falling within the Scope defined in section 2 will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channel listed in the Global Policy. Notification via the internal channel is encouraged to enable quick and effective resolution.</p> <p>The internal procedure allows whistleblowers to submit reports by any means (written or oral) to the Company's appointed Competent Person: Chief Compliance Officer (complianceandethics@syneoshealth.com)</p> <p>If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, a videoconference or a physical meeting should be arranged within 14 days.</p> <p>The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.</p> <p>The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt, unless they have requested not to receive an acknowledgment or if doing so would reveal their identity.</p>

<p>oznamovateli výsledky svého posouzení. Ve složitých případech může být tato lhůta dvakrát prodloužena až o 30 dnů, a to po písemném oznámení. Společnost bude oprávněna vyžádat si od oznamovatele další informace.</p> <p>Pokud posouzení neodhalí porušení předpisů, oznamovatel by měl být informován o závěru a o svém právu podat oznámení prostřednictvím externího kanálu. Pokud je porušení předpisů prokázáno, měla by společnost bez zbytečného odkladu navrhnout opatření, která zabrání protiprávnímu stavu nebo jej napraví, a oznamovatele o těchto opatřeních informovat.</p> <p>Společnost oznámení uzavře, pokud se zjistí, že obvinění nespádají do působnosti právních předpisů o whistleblowingu. Oznamovatel bude v takovém případě písemně informován.</p> <p>Pokud oznamovatel podá oznámení anonymně, společnost určí vhodný postup na základě obsahu takového oznámení a může se odchýlit od postupu uvedeného v tomto dodatku.</p>	<p>The Company will, within 30 days from the date of receipt of the report, assess the validity of the report and notify the reporter in writing of the results of their assessment. In complex cases this period can be extended twice by up to 30 days, subject to written notification. The Company will be free to request further information from the whistleblower.</p> <p>If the assessment does not reveal an infringement, the whistleblower should be informed of the conclusion and their right to submit the report via an external channel. If there is evidence of an infringement, the Company should propose steps to prevent or correct the illegal situation without undue delay and notify the whistleblower of the measures.</p> <p>The Company shall close the report when the allegations are found to be outside of the scope of whistleblowing law. In this case, the whistleblower will be informed in writing.</p> <p>Where a whistleblower submits a report anonymously, the Company will determine the appropriate process based on the content of this report and may deviate from the process set out in this Supplement.</p>
<p>4.2 Externí kanály pro oznamování</p>	<p>4.2. External reporting channels</p>
<p>4.2.1 Oznamování ministerstvu spravedlnosti</p>	<p>4.2.1. Reporting to the Ministry of Justice</p>
<p>Ministerstvo spravedlnosti bylo pověřeno přijímáním a posuzováním oznámení a poskytováním související pomoci oznamovatelům.</p> <p>Oznamovatelé mohou ministerstvu spravedlnosti podávat externí oznámení ústně nebo písemně. Pokud se oznámení podává ústně, lze tak učinit telefonicky nebo prostřednictvím jiného hlasového systému, nebo pokud o to oznamovatel požádá, měla by být do 14 dnů dohodnuta videokonference nebo osobní schůzka.</p> <p>Ministerstvo spravedlnosti je povinno potvrdit přijetí oznámení do sedmi dnů od jeho obdržení, pokud oznamovatel nepožádá, aby tak mu potvrzení zasláno nebylo, nebo pokud by to odhalilo jeho totožnost. Oznámení musí být posouzeno a oznamovatel musí být písemně vyrozuměn o výsledku posouzení do 30 dnů, ve složitých případech do 60 dnů.</p> <p>Výše uvedené lhůty nemusí být dodrženy, pokud oznamovatel předtím nepodal své oznámení prostřednictvím interního kanálu pro oznamování. Více informací o postupu podávání oznámení prostřednictvím ministerstva spravedlnosti naleznete na níže uvedeném odkazu: Chci podat oznámení – veřejnost – Oznamovatel (justice.cz)</p>	<p>The Ministry of Justice has been appointed to receive and assess reports and provide associated assistance to whistleblowers.</p> <p>Whistleblowers may submit external reports to the Ministry of Justice orally or in writing. If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, a videoconference or a physical meeting should be arranged within 14 days.</p> <p>The Ministry of Justice is required to acknowledge the report within seven days of its receipt unless requested by the reporter not to do so or if doing so would reveal their identity. The report must be assessed, and the whistleblower notified in writing of the results of the assessment within 30 days, or 60 days in complex cases.</p> <p>The timeframes above may be disapplied if the whistleblower has not previously submitted their report via the internal reporting channel. More information on the reporting procedure via the Ministry of Justice is available via the link below: Chci podat oznámení – veřejnost – Oznamovatel (justice.cz)</p>
<p>5. Zákaz odvetných opatření</p>	<p>5. No Retaliation</p>

<p>Zásada zákazu odvetných opatření se vztahuje nejen na spolupracovníky nebo přidružené osoby, které podávají oznámení v rámci Globálních zásad, ale také na prostředníky, tj. osoby, které oznamovatelům pomáhají při oznamování, třetí strany spojené s oznamovatelem, jako jsou kolegové a rodinní příslušníci, a právnické osoby, které oznamovatele vlastní, pro které pracují nebo jsou s nimi spojeni v pracovním kontextu.</p> <p>Právní předpisy České republiky stanoví rozsáhlý seznam jednání nebo opomenutí, která lze považovat za odvetná opatření, mezi něž patří mimo jiné rozvázání pracovního poměru, propouštění, disciplinární opatření, snížení platu, přeložení na jiné pracoviště, neumožnění odborného rozvoje, vyžadování lékařského posudku, jakýkoli druh diskriminace, negativní hodnocení pracovního výkonu, obtěžování, nepřevedení smlouvy na dobu určitou na smlouvu na dobu neurčitou atd.</p>	<p>The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.</p> <p>The Czech Republic law sets out an extensive list of actions or omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, not allowing professional development, requiring a medical report, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.</p>
<p>6. Podpůrná opatření</p>	<p>6. Support measures</p>
<p>Ministerstvo spravedlnosti může případným oznamovatelům poskytnout poradenství ohledně:</p> <ul style="list-style-type: none"> • jejich práv a možností podávání oznámení, • dostupnosti finanční podpory, • práva na bezplatné právní poradenství. <p>Další informace o podpoře, kterou může poskytnout ministerstvo spravedlnosti, jsou k dispozici na adrese: Whistleblower – Justice.cz</p>	<p>The Ministry of Justice can provide advice to potential whistleblowers on:</p> <ul style="list-style-type: none"> • their rights and reporting options; • the availability of financial support; • the right to free legal advice. <p>Further information on the support the Ministry of Justice can provide is available via: Whistleblower – Justice.cz</p>
<p>7. Formuláře a šablony</p>	<p>7. Forms and templates</p>
<p>Žádné</p>	<p>None</p>
<p>8. Odkazy</p>	<p>References</p>
<p>Chci podat oznámení – veřejnost – Oznamovatel (justice.cz) Whistleblower – Justice.cz</p>	<p>Chci podat oznámení – veřejnost – Oznamovatel (justice.cz) Whistleblower – Justice.cz</p>
<p>9. Přílohy</p>	<p>9. Appendices</p>
<p>Žádné</p>	<p>None</p>
<p>10. Historie revidování</p>	<p>10. Revision history</p>
<p>Žádná</p>	<p>None</p>

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Document Type:	Policy Supplement	
Owning Function:	Legal	Document Number and Version: 1
Applicable Location(s):	France	Effective Date: 1 Feb 23

Type de document:	Supplément de Politique	
Département responsable:	Legal	Numéro et version du document: 1
Pays:	France	Date d'entrée en vigueur: 1 février 2023

1. Summary	1. Résumé
<p>This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the Global Policy) by addressing the specific legislative changes that have been implemented in France pursuant to <i>EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)</i> and local legislation.</p> <p>This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Synoes Health's entities located in France (the "Company").</p>	<p>Le présent Supplément de Politique vise à compléter la Politique globale qui invite les collaborateurs à prendre la parole: Speak Up Policy ("Politique globale") existante en abordant les changements législatifs spécifiques qui ont été mis en œuvre en France conformément à la Directive européenne 2019/1937 sur la protection des personnes qui signalent des violations du droit de l'Union du 23 octobre 2019 (Directive sur les lanceurs d'alerte) et à la législation locale.</p> <p>Le présent Supplément de Politique traite donc des différences d'application par rapport à la Politique globale sur les lanceurs d'alerte qui s'appliquent aux sociétés du groupe Synoes Health basées en France. (l'«Entreprise»).</p>
2. Scope	Champ d'application
<p>This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:</p> <ul style="list-style-type: none"> shareholders and holders of voting rights in the Company's general assembly; members of the Company's administrative, management or supervisory body; external and occasional staff of the Company; co-contractors of the Company and their subcontractors; those who report or publicly disclose information on breaches acquired in a work- 	<p>Le présent Supplément de Politique s'applique non seulement à tous les dirigeants, administrateurs, employés et travailleurs temporaires (collectivement, les Associés) et à tous les agents de l'Entreprise, y compris, mais sans s'y limiter, les contractants indépendants, les consultants et les représentants collectivement, les Personnes Associées), mais aussi aux:</p> <ul style="list-style-type: none"> actionnaires, associés et titulaires de droits de vote au sein de l'assemblée générale de l'Entreprise ; membres de l'organe d'administration, de direction ou de surveillance de l'Entreprise; collaborateurs extérieurs et occasionnels de l'Entreprise;

<p>based relationship with the Company which has since ended; and</p> <ul style="list-style-type: none"> • those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in France. 	<ul style="list-style-type: none"> • cocontractants de l'Entreprise concernée et leurs sous-traitants; • personnes qui signalent ou divulguent publiquement des informations sur des violations acquises dans le cadre d'une relation de travail avec l'Entreprise qui a pris fin depuis; et • personnes dont la relation de travail avec l'Entreprise n'a pas encore commencé dans les cas où les informations sur les infractions ont été acquises au cours du processus de recrutement ou d'autres négociations précontractuelles en France.
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<p>3. Definition of whistleblower</p>	<p>Définition du lanceur d’alerte</p>
<p>A whistleblower is defined as "a natural person who reports or discloses, without direct financial compensation and in good faith, information concerning a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, of a unilateral act of an international organisation taken on the basis of such a commitment, of the law of the European Union, or of the French law or regulations"</p> <p>Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.</p> <p>However, the disclosure of facts, information or documents relating to national defence secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of the investigation, the secrecy of the judicial inquiry or the professional secrecy of lawyers is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.</p>	<p>Le lanceur d’alerte est défini comme « une personne physique qui signale ou divulgue sans contrepartie financière directe et de bonne foi, des informations portant sur un crime, un délit, une menace ou un préjudice pour l’intérêt général, une violation ou une tentative de dissimulation d’une violation, d’un engagement international régulièrement ratifié ou approuvé par la France, d’un acte unilatéral d’une organisation internationale pris sur le fondement d’un tel engagement, du droit de l’Union européenne, de la loi ou du règlement français».</p> <p>Ces informations signalées sont appelés "Reported Event" ou "Accounting Reported Event" dans la Politique globale.</p> <p>Cependant, est interdite la divulgation de faits, informations ou documents ayant trait au secret de la défense nationale, au secret médical, au secret des délibérations judiciaires, au secret de l’enquête, au secret de l’instruction judiciaire ou encore au secret professionnel de l’avocat. Ces faits, informations et documents et n’entreront pas dans le champ d’application de la Politique globale ou du présent Supplément de politique.</p>
<p>4. Reporting channels</p>	<p>4. Canaux de signalement</p>
<p>The whistleblower can choose between two types of internal reporting:</p> <p>(i) reporting at local level within the Company with which the whistleblower has a direct link; or</p> <p>(ii) reporting to the Syneos Health group,</p> <p>or</p> <p>external reporting to the competent authority (see paragraph 4.2.1), the Rights Defender (see paragraph 4.2.2), the courts or a European body.</p>	<p>Le lanceur d’alerte peut choisir entre deux voies de signalement interne, c’est-à-dire</p> <p>(i) un signalement au niveau local au sein de l’Entreprise avec laquelle le lanceur d’alerte a un lien direct ; ou</p> <p>(ii) un signalement au sein du groupe Syneos Health,</p> <p>ou</p> <p>un signalement externe à l’attention de l’autorité compétente (cf. art. 4.2.1), du Défenseur des Droits (cf. art. 4.2.2), à la justice ou un organe européen.</p>
<p>4.1. Internal reporting channels</p>	<p>4.1 Procédure de signalement interne</p>

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events, as defined in the Global Policy) via the local or global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised at the latest 20 working days after receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within 7 working days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven working days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become

Les lanceurs d'alerte pourront soumettre des signalements internes (Reported Events or Accounting Reported Events, tels que définis dans la Politique globale) par le biais des canaux de signalement au niveau local ou global énumérés dans la Politique globale.

La procédure interne donne la possibilité aux lanceurs d'alerte de transmettre des signalements par tout moyen (écrit ou oral). Si un signalement est adressé par oral, ce signalement peut s'effectuer par téléphone ou par tout autre système de messagerie vocale et, sur demande du lanceur d'alerte et selon son choix, lors d'une visioconférence ou d'une rencontre physique organisée au plus tard 20 jours ouvrés après réception de la demande.

L'Entreprise garantit la confidentialité des données personnelles divulguées par le lanceur d'alerte et se conforme à la Politique de protection des données du groupe Syneos Health lors de la gestion des alertes.

Le lanceur d'alerte aura le droit de transmettre son signalement d'une manière anonyme, s'il l'estime nécessaire.

Le lanceur d'alerte sera informé par écrit de la réception de son signalement dans un délai de 7 jours ouvrés à compter de cette réception. L'Entreprise sera libre de demander des compléments d'information à l'auteur du signalement.

Si applicable, le lanceur d'alerte sera informé des raisons pour lesquelles l'Entreprise estime si le signalement ne respecte pas les conditions de la loi, de la Politique globale ou du Supplément de politique.

L'Entreprise communiquera par écrit au lanceur d'alerte, dans un délai raisonnable n'excédant pas trois mois à compter de l'accusé de réception du signalement ou, à défaut d'accusé de réception, trois mois à compter de l'expiration d'une période de sept jours ouvrés suivant le signalement, des informations sur les mesures envisagées ou prises pour évaluer l'exactitude des allégations et, le cas échéant, remédier à l'objet du signalement ainsi que sur les motifs de ces dernières.

L'Entreprise procède à la clôture du signalement lorsque les allégations s'avèrent inexactes ou infondées, ou lorsque le signalement est devenu sans objet. Dans ce

<p>irrelevant. In this case, the whistleblower will be informed in writing.</p> <p>The Company must ensure that competent authorities review their procedures for receiving reports, and their follow-up, regularly, and at least once every three years. In reviewing these procedures, the competent authorities shall take account of their experience as well as that of other competent authorities and adapt their procedures accordingly.</p>	<p>cas, le lanceur d’alerte sera informé par écrit de la clôture du dossier.</p> <p>L’Entreprise doit veiller à ce que les autorités compétentes réexaminent régulièrement, et au moins une fois tous les trois ans, leurs procédures de réception des rapports, ainsi que leur suivi. Lors de la révision de ces procédures, les autorités compétentes doivent tenir compte de leur expérience ainsi que de celle des autres autorités compétentes et adapter leurs procédures en conséquence.</p>
<p>4.2 External Reporting channels</p>	<p>4.2 Procédures de signalement externe</p>
<p>4.2.1 Reporting to the competent authorities</p>	<p>4.2.1 Signalements aux autorités compétentes</p>
<p>The list of competent authorities is provided in the Annex to the Decree of 3 October 2022. Each competent authority establishes its own procedure for collecting and processing the whistleblowers alerts.</p> <p>The whistleblower must specify, at the same time the report is communicated, whether or not the report was also communicated internally.</p> <p>The competent authority is required to acknowledge receipt of the report within 7 days and provide feedback within three months or, in complex cases, six months from the date of acknowledgement.</p>	<p>La liste des autorités compétentes est fournie dans l'annexe du Décret du 3 octobre 2022. Chaque autorité compétente établit sa propre procédure de collecte et de traitement des signalements des lanceurs d'alerte.</p> <p>Le lanceur d’alerte devra préciser, concomitamment à son signalement, s’il a ou non transmis ce dernier par la voie interne.</p> <p>L'autorité compétente accusera réception de l'alerte dans les 7 jours et fournira des commentaires dans les trois mois ou, dans les cas complexes, dans les six mois à compter de la date de l'accusé de réception.</p>
<p>4.2.2 Reporting to the Rights Defender</p>	<p>4.2.2 Signalements au Défenseur des droits</p>
<p>The Rights Defender (the administrative authority in charge of defending rights) will intervene, when requested by the whistleblower, to inform and advise whistleblowers and "defend" their rights and freedoms.</p> <p>In addition, the Rights Defender is able to receive reports directly. He will therefore be in charge of collecting and processing them. If, however, the report does not fall within the scope of his competence, the whistleblower will be directed to the competent authority.</p> <p>More information on the reporting procedure via the Rights Defender is set out below:</p> <p>https://www.defenseurdesdroits.fr/fr/lanceurs-dalerte</p>	<p>Le Défenseur des droits (l'autorité administrative chargée de la défense des droits) interviendra, à la demande d'un lanceur d'alerte, pour informer, conseiller le lanceur d'alerte et « défendre » ses droits et libertés.</p> <p>Par ailleurs, le Défenseur des droits pourra recevoir directement les signalements. Il sera ainsi en charge de leurs recueil et traitement. Si, toutefois, le signalement ne rentre pas dans son périmètre de compétence, le lanceur d'alerte sera orienté vers l'autorité compétente.</p> <p>Plus d'informations sur la procédure de signalement via le Défenseur des droits ci-dessous:</p> <p>https://www.defenseurdesdroits.fr/fr/lanceurs-dalerte</p>

<p>5. No retaliation</p>	<p>5. Protection contre les représailles</p>
<p>The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work related context.</p> <p>French law sets out an extensive list of acts that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non conversion of fixed-term contract into permanent contract etc.</p>	<p>Le principe d'interdiction de représailles s'applique non seulement aux Associés ou aux Personnes Associées qui font un signalement en vertu de la Politique globale, mais aussi aux facilitateurs, c'est-à-dire ceux qui aident les lanceurs d'alerte dans le processus, les tiers liés aux lanceurs d'alerte tels que les collègues et les membres de la famille et les entités juridiques dont le lanceur d'alerte est propriétaire, pour lesquelles il travaille ou qui sont liés au lanceur d'alerte dans un contexte professionnel.</p> <p>La loi française dresse une liste étendue de faits susceptibles d'être considérés comme une mesure de représailles qui comprennent, sans s'y limiter, le licenciement, les mesures disciplinaires, la réduction du salaire, le transfert du lieu de travail, tout type de discrimination, l'évaluation négative des performances, le harcèlement, la non conversion d'un contrat à durée déterminée en contrat à durée indéterminée, etc..</p>
<p>6. Financial and psychological support</p>	<p>6. Support psychologique et financier</p>
<p>The competent authorities can provide psychological support to the whistleblower. In addition, they can grant temporary financial assistance to support an appeal against retaliation and at the expense of the other party. This financial assistance will be offered in the event the whistleblower's financial situation has seriously deteriorated as a result of the alert.</p>	<p>Les autorités compétentes peuvent apporter un soutien psychologique au lanceur d'alerte. En outre, elles peuvent accorder une aide financière temporaire dans le cadre d'un recours contre les représailles et aux frais de l'autre partie. Cette aide financière sera proposée dans le cas où la situation financière du dénonciateur s'est gravement détériorée à la suite de l'alerte.</p>
<p>7. Forms and templates</p>	<p>7. Formulaire et modèles</p>
<p>None</p>	<p>Aucun</p>
<p>8. References</p>	<p>8. Références</p>
<ul style="list-style-type: none"> • EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law • Law n° 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers • Organic law no. 2022-400 of 21 March 2022 aimed at strengthening the role of the Rights Defender in the field of whistleblowing • Decree No. 2022-1284 of 3 October 2022 on the procedures for collecting and processing whistleblower alerts and setting the list of external authorities established by Law No. 2022-401 of 21 March 2022 to improve the protection of whistleblowers 	<ul style="list-style-type: none"> • Directive européenne 2019/1937 sur la protection des personnes qui signalent des violations du droit de l'Union du 23 octobre 2019 • LOI n° 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d'alerte • LOI organique n° 2022-400 du 21 mars 2022 visant à renforcer le rôle du Défenseur des droits en matière de signalement d'alerte • Décret n° 2022-1284 du 3 octobre 2022 relatif aux procédures de recueil et de traitement des signalements émis par les lanceurs d'alerte et fixant la liste des autorités externes instituées par la loi n° 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d'alerte

9. Appendices	9. Annexes
None	Aucun
10. Revision history	10. Historique de modifications
None	Aucune

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Germany	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Germany pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Germany (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Germany.

3. Definition of whistleblower

A whistleblower is defined as "a natural person who has obtained information on infringements in connection with their professional activities who discloses such information to the reporting bodies provided for under the German Whistleblower Act." Infringements are acts or omissions that are unlawful and concern the areas of law in the scope of the Whistleblowing Directive or are abusive because they run counter to the aim or purpose of the Directive.

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

However, the disclosure of facts, information or documents from the intelligence services or that could harm national security or essential security interests and disclosures in breach of a duty of confidentiality on respect of classified information, the secrecy of judicial deliberations, the duty of confidentiality on the part of lawyers or medical professionals, is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.

4. Reporting Channels

The whistleblower can choose between two types of reporting:

- (i) reporting to the Syneos Health group;
- or
- (iii) external reporting to the Federal Office of Justice (see paragraph 4.2.1), an external reporting channel introduced by the German federal states, the Federal Cartel Office or the Federal Financial Supervisory Authority.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channel listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable time.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken and the reason for them.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

4.2.1. Reporting to the Federal Office of Justice

The Federal Office of Justice has been appointed to receive and investigate reports and provide associated assistance to whistleblowers.

Whistleblowers may submit external reports to the Federal Office of Justice orally or in writing.

The Federal Office of Justice is required to acknowledge the report within seven days of its receipt unless requested by the reporter not to do so or if doing so would reveal their identity. The report must be assessed, and the whistleblower notified in writing of the results of the assessment within three months or six months if the complex cases.

More information on the reporting procedure via the Federal Office of Justice is available via the link below:

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html

External reporting channel introduced by the German federal states have not been set up yet.

External reporting to the Federal Cartel Office or the Federal Financial Supervisory Authority is only possible regarding specific kinds of infringements as stated in the German Whistleblower Act. More information in this respect is available via the links below:

https://www.bundeskartellamt.de/DE/Hinweise_auf_Verstoesse/Hinweise_node.html

https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblower owns, works for or is connected within a work-related context.

Retaliation may include, but is not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

The Federal Office of Justice provide comprehensive information and advice on remedies and procedures for protection against retaliations for those that are considering making a report.

7. Forms and templates

<https://formulare.bfj.bund.de/ffw/form/display.do?%24context=E73F949D9DEE49877A07>

8. References

<https://www.gesetze-im-internet.de/hinschg/BJNR08C0B0023.html>

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html

https://www.bundeskartellamt.de/DE/Hinweise_auf_Verstoesse/Hinweise_node.html

https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Greece	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Greece pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Greece (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company, volunteers or interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Greece.

3. Definition of whistleblower

A whistleblower is defined as "a person reporting a breach of European Law falling within the scope of the Whistleblowing Directive".

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

However, the disclosure of facts, information or documents relating to breaches of procurement rules relating to defense or security is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.

4. Reporting Channels

The whistleblower can choose between:

- (i) internal reporting to the Syneos Health group,
- or

- (ii) external reporting to the National Transparency Authority (see paragraph 4.2.1), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable period following receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

4.2.1. Reporting to the National Transparency Authority

The National Transparency Authority has been designated as the competent authority for the acceptance/receipt, management and monitoring of reports.

The National Transparency Authority is required to acknowledge receipt of the report within seven days and provide feedback within three months or, in complex cases, six months from the date of acknowledgement.

Further information about the National Transparency Authority and the reporting process is available via the link below:

<https://aead.gr/en/>

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

Greek law sets out an extensive list of acts and omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

The competent authorities can provide psychological support and free comprehensive and independent information and advice on available procedures and remedies, on protection against reprisals and on the rights of whistleblowers.

7. Forms and templates

None

8. References

<https://aead.gr/en/>

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Hungary	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Hungary pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health’s entities located in Hungary (the “**Company**”).

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company’s administrative, management or supervisory body;
- external and occasional staff of the Company, volunteers or interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Hungary.

3. Definition of whistleblower

A whistleblower is defined as a person who makes a complaint regarding illegal or presumed illegal acts, omissions, and other abuses.

Such information will be considered as a “Reported Event” or an “Accounting Reported Event” under the Global Policy.

4. Reporting Channels

The whistleblower can choose between:

- (i) internal reporting to the Syneos Health group,
- or
- (ii) external reporting to the relevant state bodies or the Commissioner of Fundamental Rights (see paragraph 4.2.1), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable period following receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding 30 days from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures. The time from for the response may be extended to three months in justified cases.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

4.2.1. Reporting to the relevant state bodies or the Commissioner of Fundamental Rights

Hungarian whistleblower legislation provides for external reports to be submitted to relevant state bodies or the Commissioner of Fundamental Rights. Further details will be published on the relevant websites.

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

Hungarian law sets out acts and omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

The Commissioner of Fundamental Rights will provide comprehensive and independent, easily accessible to the public, free information on the procedures and legal remedies available to whistleblowers and the rights of the persons involved in the notification.

7. Forms and templates

None

8. References

None

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Italy	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Italy pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local regulation (Legislative Decree no. 24 of 10 March 2023, implementing the Whistleblowing Directive in Italy and the guidance of National Anti-Corruption Authority).

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Italy (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, "**Associates**") and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively "**Associated Persons**") but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company;
- co-contractors of the Company and their subcontractors;
- volunteers and trainees (both paid and unpaid);
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company during the probationary period;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Italy.

3. Definition of whistleblower

A whistleblower is defined as "a natural person who reports conduct, acts, omissions resulting in violations (or grounded suspicion of violations) of Italian and EU laws and regulations, as encountered by the whistleblower within the employment context, affecting the public interest or the integrity of the public administration or a private entity and consisting of administrative, accounting, civil or criminal offenses or significant illegal conduct".

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

However, the disclosure of facts, information or documents relating to a personal interest of the reporting person which pertains exclusively to their individual employment, violations already compulsorily regulated by other EU or Italian regulations, breaches of national security, classified

information, forensic and medical professional secrecy, judicial deliberations and the disclosure of facts, information or documents unlawfully collected is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.

4. Reporting Channels

The whistleblower can choose between two types of reporting:

- (i) internal reporting to the Syneos Health group;
- (ii) external reporting to the National Anti-Corruption Authority (see paragraph 4.2.1);
- (iii) public disclosure;
- (iv) reporting to the Courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy, but reporting through electronic ordinary mail or electronic certified mail is not allowed under the local regulations. If a paper report is made, it must be placed in two sealed envelopes (one with the identification data and the other with the report), then both envelopes should be inserted in a third sealed envelope marked as “confidential”.

Where a report is received via a different channel, it will be submitted to the Corporate Compliance and Ethics team within 7 days and the reporter will be notified.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable time frame.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

Whistleblowers shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within 7 days of its receipt. The Company will maintain communications with the whistleblower and may request further information from them.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven working days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the

accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

Whistleblowers may make an external report in the following circumstances:

- an internal reporting channel has not been established or does not comply with the required standards;
- they have already made an internal report that has not been followed up or had a negative outcome;
- they have reasonable grounds to believe that an internal report would not be followed up or could lead to retaliation (e.g., conflict of interest cases in which the handler of the report coincides with the reporter, the reported person or otherwise is a person involved or affected by the report);
- they have reasonable grounds to believe that the violation may constitute an imminent or manifest danger to the public.

4.2.1. Reporting to the Italian National Anti-Corruption Authority (“ANAC”)

In Italy ANAC is an independent administrative authority with regulatory, investigation and sanctioning powers in the area of whistleblowing.

Whistleblowers may submit external reports to ANAC orally or in writing via its IT platform. If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting within a reasonable time frame.

Where an external report is addressed via a different channel, it will be submitted to ANAC team within 7 days and the reporter will be notified.

ANAC ensure the confidentiality of personal data disclosed by the whistleblower according to the national provisions in force.

Whistleblowers shall also have the right to anonymously report, if they consider it necessary.

ANAC is required to acknowledge the report within 7 days of its receipt unless requested by the reporter not to do so or if doing so would jeopardise the confidentiality of the report. They must diligently follow up on reports, investigate as required and reply to the reporting person within three months (or six months if there are justified reasons for delay) from the acknowledgment, or if no acknowledgement is received, three or six months from the expiry of the period of seven working days following the report being made. With the reply ANAC shall inform the whistleblower on the investigation outcome, which can also consist in the closing of the report, its transmission to other competent authorities, a recommendation or imposition of administrative fines.

ANAC may not follow up on reports of minor violations and proceed to dismiss them.

More information on the reporting procedure via ANAC is available via the links below:

Anac - National Anti-Corruption Authority - EN brochure - 2023 - www.anticorruzione.it ([English language](#))

[Whistleblowing - www.anticorruzione.it](http://www.anticorruzione.it) (Italian language)

5. No Retaliation

The principle of no retaliation not only applies to Associates, Associated Persons and to the other subjects referred to in Article 2, who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues, ex-colleagues, consultants and family members and legal entities that the whistleblower owns, works for or is connected within a work-related context.

Italian law sets out an extensive list of acts and omissions, even only attempted or threatened, that can be considered as retaliatory measures, which include, but are not limited to: employment termination, layoff, disciplinary measures (including financial sanctions and suspension), reduction of salary, downgrading or non-promotion, change of duties, transfer of place of work, any type of discrimination, negative merit notes, negative references, harassment, ostracism, non-conversion of fixed-term contract into permanent contract, reputational damage, cancellation of supply contracts, request for submission for psychiatric or medical test etc.

6. Support Measures

A list of third sector entities that provide reporting persons with support measures is available via the ANAC website ([Whistleblowing - www.anticorruzione.it](http://www.anticorruzione.it)). Below some of the third sector entities providing support measures are listed:

- Amici di Mimmo organizzazione di volontariato;
- Cooperativa sociale Kiosei;
- Associazione Generazione 231;
- Associazione Italia civile;
- Libera;
- MigliorAttivaMente APS;
- Associazione Protezione Diritti e Libertà Privacy APS;
- Associazione Istituto formativo per lo sviluppo di politiche attive del lavoro;
- Associazione Transparency International Italia;
- Associazione Pro Territorio - Cittadini-Odv.

The support measures consist of information, assistance and free of charge advice on methods of reporting, the protection from retaliation and the methods and conditions of access to legal aid.

Third sector entities' contact information and updated list can be found in the abovementioned website.

Whistleblowers, their facilitators and persons belonging to the same work context as the whistleblower can also inform ANAC about the retaliation carried out, attempted or threatened against them because of a reporting falling under this Policy Supplement or the Global Policy. Once received the communication, ANAC shall verify its accuracy, request additional information if necessary and adopt any measures, if appropriate. ANAC shall also inform the National Labor Inspectorate and any other competent authority for any measure to be adopted. If retaliation is established, fines are imposed on the person responsible for the retaliatory measure.

7. Forms and templates

None

8. References

Whistleblowing Directive

Italian Legislative Decree 10 March 2023, no. 24

[ANAC | Home page - www.anticorruzione.it](http://www.anticorruzione.it)

Anac - National Anti-Corruption Authority - EN brochure - 2023 - www.anticorruzione.it

[Whistleblowing - www.anticorruzione.it](http://www.anticorruzione.it)

Global Policy

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Netherlands	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in the Netherlands pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in the Netherlands (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company, volunteers or interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in the Netherlands.

3. Definition of whistleblower

A whistleblower is defined as "a natural person who reports or publicly discloses a suspected abuse in the context of his work-related activities". Abuse for these purposes refers to a breach of European Union law, or an act or omission which puts the public interest at stake and relates to:

- a breach of a statutory regulation or internal rule that imposes a specific obligation, based on a statutory obligation; or
- a risk to public health, public safety or the environment or an improper act or omission that jeopardises the proper functioning or public services.

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

4. Reporting Channels

The whistleblower can choose between:

- (i) internal reporting to the Syneos Health group,

or

- (ii) external reporting to the Dutch Whistleblowing Authority (see paragraph 4.2.1), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable period following receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

4.2.1. Reporting to the Dutch Whistleblowers Authority

The Dutch Whistleblowers Authority conduct investigations into wrongdoings within organisations or into the disadvantaging of employees due to reporting a wrongdoing.

Further information about the reporting process is available via the link below:

<https://www.huisvoorklokkenluiders.nl/english>

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family

members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

The law in the Netherlands sets out an extensive list of acts and omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc.

6. Support measures

The Dutch Whistleblowers Authority provide advice and support for employees who want to report a possible wrongdoing within their organisation.

Further information about their services is available via the link below:

<https://www.huisvoorklokkenluiders.nl/english>

7. Forms and templates

None

8. References

<https://www.huisvoorklokkenluiders.nl/english>

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Romania	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up Policy (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Romania pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Romania (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company;
- co-contractors of the Company and their subcontractors;
- volunteers and interns;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Romania.

Definition of whistleblower

A whistleblower is defined as " persons who report violations of the law, which have occurred or are likely to occur, including suspicions regarding actual or potential violations of the law which have occurred or are likely to occur, as well as information regarding attempts to hide such violations."

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

However, the disclosure of facts, information or documents relating to classified information, professional secrecy of lawyers, medical information, secret nature of judicial deliberations and criminal procedure rules will not fall within the scope of the Global Policy or this Policy Supplement.

3. Reporting Channels

The whistleblower can choose between two types of internal reporting:

- (i) reporting to the Syneos Health group,
or
- (ii) external reporting to the competent authority (see paragraph 4.2.1), the National Integrity Agency (see paragraph 4.2.2), the courts or a European body.

3.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or, where requested by the whistleblower, can choose by a videoconference or a physical meeting.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, in which case the Company shall action the report, to the extent that it contains substantial indication of violations of the law to allow the report to be actioned.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, to remedy the subject matter of the report and the reasons for such measures.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

The Company will maintain an electronic register of reports which includes the date of receipt of the report, the whistleblower's details, the object of the report and the method of resolution.

3.2. External reporting channels

3.2.1. Reporting to the Competent Authority

The competent authorities are the authorities and public institutions that, according to the special legal provisions, receive and solve reports regarding violations of the law, in their field of

competence. Each competent authority establishes its own procedure for collecting and processing the whistleblowers alerts.

The whistleblower must specify, at the same time the report is communicated, whether or not the report was also communicated internally.

The competent authority is required to acknowledge receipt of the report within seven days and provide feedback within three months or, in complex cases, six months from the date of acknowledgement.

3.2.2. Reporting to the National Integrity Agency

The National Integrity Authority is a regulatory authority that oversees the laws about work environment and working hours. Whistleblowers can

More information on the reporting procedure via the National Whistleblower Scheme is set out below:

<https://www.integritate.eu/Comunicate.aspx?Action=1&NewsId=3439&M=NewsV2&PID=20>

4. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as colleagues and family members and legal entities that the whistleblowers owns, works for or is connected within a work-related context.

Romanian law sets out an extensive list of acts and omissions that can be considered as retaliatory measures, which include, but are not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract, causing damage to reputation, unilateral termination of a service contract, requesting a medical examination etc.

5. Support measures

The National Integrity Authority can provide assistance to whistleblowers in relation to their protection against reprisals. In addition, the bar in the relevant constituency can provide free legal assistance to support an appeal against retaliation.

6. Forms and templates

None

7. References

<https://www.integritate.eu/Comunicate.aspx?Action=1&NewsId=3439&M=NewsV2&PID=20>

8. Appendices

None

9. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Spain	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement or complement as the case may be, the existing Global Speak-Up Policy (the **Global Policy**) for Syneos Health's entities located in Spain (the "**Company**") by addressing the specific legislative changes that have been implemented in Spain pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company;
- volunteers and unpaid trainees;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Spain.

3. Definition of whistleblower

A whistleblower is defined as "a natural person who reports any actions or omissions that may constitute infringements of European law or serious or very serious criminal or administrative offences, including offences that imply economic loss for the public treasury and/or social security."

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

However, the above excludes the disclosure of classified information or facts, information or documents relating to professional secrecy of medical and legal professionals, the duty of confidentiality of the Security Forces and secret judicial deliberations, which is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.

4. Reporting Channels

The whistleblower can choose between two types of reporting:

- (i) internal reporting within the Syneos Health group;

or

- (ii) external reporting to the Independent Informant Protection Authority ('AAI') (see paragraph 4.2), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channel listed in the Global Policy which is managed by the Corporate Compliance and Ethics Office and whose Chief Compliance Officer is designated as the person responsible for the whistleblowing system ("**Responsable del Sistema**" in Spanish).

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given in writing, it can be done via post or electronic means. If a report is done orally, it can be done by telephone or any other voice mail system or, where requested by the whistleblower, can choose by a videoconference or a physical meeting organised at the latest seven days after receipt of the request. The internal procedure also allows the presentation and subsequent processing of anonymous communications.

Any communication must contain the following requirements and content, otherwise, it could be inadmissible:

- i. Identification data of the person making the communication, unless they choose to make the communication anonymously.
- ii. With the above exception, contact information of the informant: telephone and contact email.
- iii. Relationship that the reporting person maintains with the Company
- iv. Identification of the working centre or entity, and municipality or city in which the events reported on have occurred.
- v. Detailed description of the facts reported: date, object or category, description of the facts.
- vi. Means of evidence that serve as support for communication (identification of possible witnesses and/or attached documents)

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt, unless doing so may jeopardize the confidentiality of the process. The Company will be free to request further information from the whistleblower.

If applicable, the whistleblower will be informed of the reasons why the Company believes that the report does not comply with the requirements of the law and or the Global Policy and or the Policy Supplement.

The Company will analyse the reported information in accordance with the terms of the Spain Information reporting channel management procedure, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following

the report being made. The timeframe for providing feedback may be extended to six months in complex cases.

The Company will also provide the whistleblower with written confirmation of the following:

- the measures envisaged or taken to assess the accuracy of the allegations; and
- Any measures to remedy the subject matter of the report and the reasons for such measures.

The timeframe for providing feedback may be extended to six months in complex cases.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports. Any person to whom a report refers will not be informed of the identity of the reporter.

The Company shall close the report if the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

If it is determined that the fact or behavior reported could constitute a crime, the Company will immediately notify the corresponding Prosecutor's Office.

4.2 External reporting to the Independent Informant Protection Authority ('AAI') or the corresponding autonomous authorities

The Spain Independent Information Protection Authority (Autoridad Independiente de Protección del Informante, 'AAI') is to be established by March 2024 as an independent autonomous or state administrative authority tasked with management of external whistleblower reports and other measures required to enforce whistleblower protection.

5. No Retaliation

The principle of no retaliation not only applies to Associates or Associated Person who make a report under the Global Policy but also to facilitators, that is those that assist the whistleblowers in the process, third parties connected with the whistleblowers such as legal representatives, colleagues and family members and legal entities that the whistleblower owns, works for or is connected with in a work-related context.

Spanish law sets out an extensive list of forms that retaliatory measures can take, which include, but are not limited to discrimination, damages, including those of a reputational nature, employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination or unfavourable treatment, negative performance review, non-conversion of fixed-term contract into permanent contract etc. unless these measures were carried out within the regular exercise of the power of management under the labor due to circumstances.

6. External support measures

The Spanish competent authorities may provide the following support to whistleblowers:

- a. free comprehensive and independent information and advice on available procedures and remedies, on protection against reprisals and on the rights of whistleblowers;
- b. effective assistance in respect of protection against retaliation, including a certification that they can avail themselves of protection under whistleblowing law;
- c. legal assistance in criminal proceedings and cross-border proceedings;
- d. in exceptional circumstances, financial and psychological support.

7. Forms and templates

None

8. References

None

9. Appendices

None

10. Revision history

None

Document Type: Policy Supplement	
Owning Function: Legal	Document Number and Version: 1
Applicable Location(s): Sweden	Effective Date: 17 December 2023

1. Summary

This Policy Supplement is intended to supplement the existing Global Speak-Up (the **Global Policy**) by addressing the specific legislative changes that have been implemented in Sweden pursuant to *EU Directive 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (Whistleblowing Directive)* and local legislation.

This Policy Supplement therefore addresses the differences in application from the Global Policy which apply in Syneos Health's entities located in Sweden (the "**Company**").

2. Scope

This Policy Supplement applies not only to all officers, directors, employees and temporary workers (collectively, Associates) and to all agents of the Company including but not limited to, contractors, consultants and representatives (collectively Associated Persons) but also to:

- shareholders and holders of voting rights in the Company's general assembly;
- members of the Company's administrative, management or supervisory body;
- external and occasional staff of the Company;
- volunteers and interns;
- co-contractors of the Company and their subcontractors;
- those who report or publicly disclose information on breaches acquired in a work-based relationship with the Company which has since ended; and
- those whose work-based relationship with the Company is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations in Sweden.

3. Definition of whistleblower

A whistleblower is defined as "a person who, in a work-related context, has received or obtained information about misconduct and reports it." A whistleblower will be protected under Swedish legislation provided at the time of reporting, they have reasonable grounds to assume that the information about the misconduct is true.

Such information will be considered as a "Reported Event" or an "Accounting Reported Event" under the Global Policy.

However, the disclosure of facts, information or documents relating to security classified information, is prohibited and will not fall within the scope of the Global Policy or this Policy Supplement.

4. Reporting Channels

The whistleblower can choose between two types of internal reporting:

- (i) reporting to the Syneos Health group,
or
- (ii) external reporting to the competent authority (see paragraph 4.2.1), the Swedish Work Environment Authority (see paragraph 4.2.2), the courts or a European body.

4.1. Internal reporting channel

Whistleblowers will be able to submit internal reports (Reported Events or Accounting Reported Events as defined in the Global Policy) via the global channels listed in the Global Policy.

The internal procedure allows whistleblowers to submit reports by any means (written or oral). If a report is given orally, it can be done by telephone or any other voice mail system or where requested by the whistleblower, can choose by a videoconference or a physical meeting organised within a reasonable time frame after receipt of the request.

The Company shall ensure the confidentiality of personal data disclosed by the whistleblower and shall comply with the Group Data Protection Policy when managing reports.

The whistleblower shall also have the right to report anonymously, if they consider it necessary.

The whistleblower will be informed in writing of the receipt of the report within seven days of its receipt. The Company will be free to request further information from the whistleblower.

The Company will, within a reasonable period of time not exceeding three months from the date of acknowledgement of receipt of the report or, if no acknowledgement is received, three months from the expiry of the period of seven days following the report being made, provide the whistleblower in writing with information on the measures taken to follow-up on the report and the reasons for the follow-up.

The Company shall close the report when the allegations are found to be inaccurate or unfounded, or when the report has become irrelevant. In this case, the whistleblower will be informed in writing.

4.2. External reporting channels

The whistleblower may make an external report in the following circumstances:

- They have first reported internally, and the recipient has not taken reasonable steps to follow-up or has not provided feedback within the required timeframe.
- They have reasonable grounds to believe that the misconduct constitutes an imminent or obvious danger to life or health and safety or risks extensive damage to the environment, or has other reasons to justify reporting to the authorities; or
- They have reasonable grounds to believe that an internal report would involve a risk of reprisals or lead to the misconduct not being remedied in an effective manner.

4.2.1. Reporting to the Competent Authority

The list of competent authorities is provided at the Appendix to Ordinance (2021: 949). Each competent authority establishes its own procedure for collecting and processing the whistleblowers alerts.

The whistleblower must specify, at the same time, the report is communicated, whether or not the report was also communicated internally.

The competent authority is required to acknowledge receipt of the report within seven days and provide feedback within three months from the date of acknowledgement.

4.2.2. Reporting to the Swedish Work Environment Authority

The Swedish Work Environment Authority is a mechanism operated by the Data Protection Authority through which whistleblowers can report misconduct that is not covered by another competent authority.

More information on the reporting procedure via the Swedish Work Environment Authority is set out below:

<https://www.av.se/en/about-us/contact-us/>

5. No Retaliation

Swedish law protects against any action or omission on the part of the business operator which entails a disadvantage or unfavorable consequence for the whistleblower, this could include, but is not limited to employment termination, layoff, disciplinary measures, reduction of salary, transfer of place of work, any type of discrimination, negative performance review, harassment, non-conversion of fixed-term contract into permanent contract etc. The protection against retaliation also includes threats and attempts at retaliation.

6. Support measures

The competent authorities can provide advice on available procedures and remedies, on protection against reprisals and on the rights of whistleblowers,

7. Forms and templates

None

8. References

<https://www.av.se/en/about-us/contact-us/>

9. Appendices

None

10. Revision history

None