



01.12.2024

Curium

Whistleblowing policy

Welcome to the Curium Whistleblowing Policy

At Curium, we are committed to conduct our business with integrity, honesty, fairness and transparency and to meet our legal and regulatory obligations.

These commitments are reflected in our [Code of Ethics](#) and in our [Values](#).

We would like to encourage our employees and partners to report any concerns they may have about Curium meeting these commitments in order to take any necessary corrective action.

This is why it is important that Curium employees and partners benefit from an internal, effective and secure reporting channel and offering all the necessary confidentiality guarantees in order to bring to Curium's attention any potential violation of the law, of our ethical rules as well as any action likely to harm the general interest.

The purpose of this Whistleblowing Policy (the "**Policy**") is to inform you about the functioning of the reporting platform provided by Curium, how alerts will be processed, the data collected in this context, and the protection available to any person who reports facts under the terms and conditions of this policy and the law.

There may be local versions of this Curium group policy to take into account the legal specificities of the countries in which we operate. Similarly, should the content of this policy differ from applicable local laws, the rules that will apply will be those that are most protective of the author of the report, whether provided for in this Policy or in local law.

Where local law provides broader safeguards than those provided for in this policy, local law shall apply.

The Curium [CLO Office](#) is the Group's permanent point of reference for the management of reports and the conduct of ethical investigations.

In this document, any reference to Curium means [Curium](#) and all subsidiaries and controlled companies of the Curium group

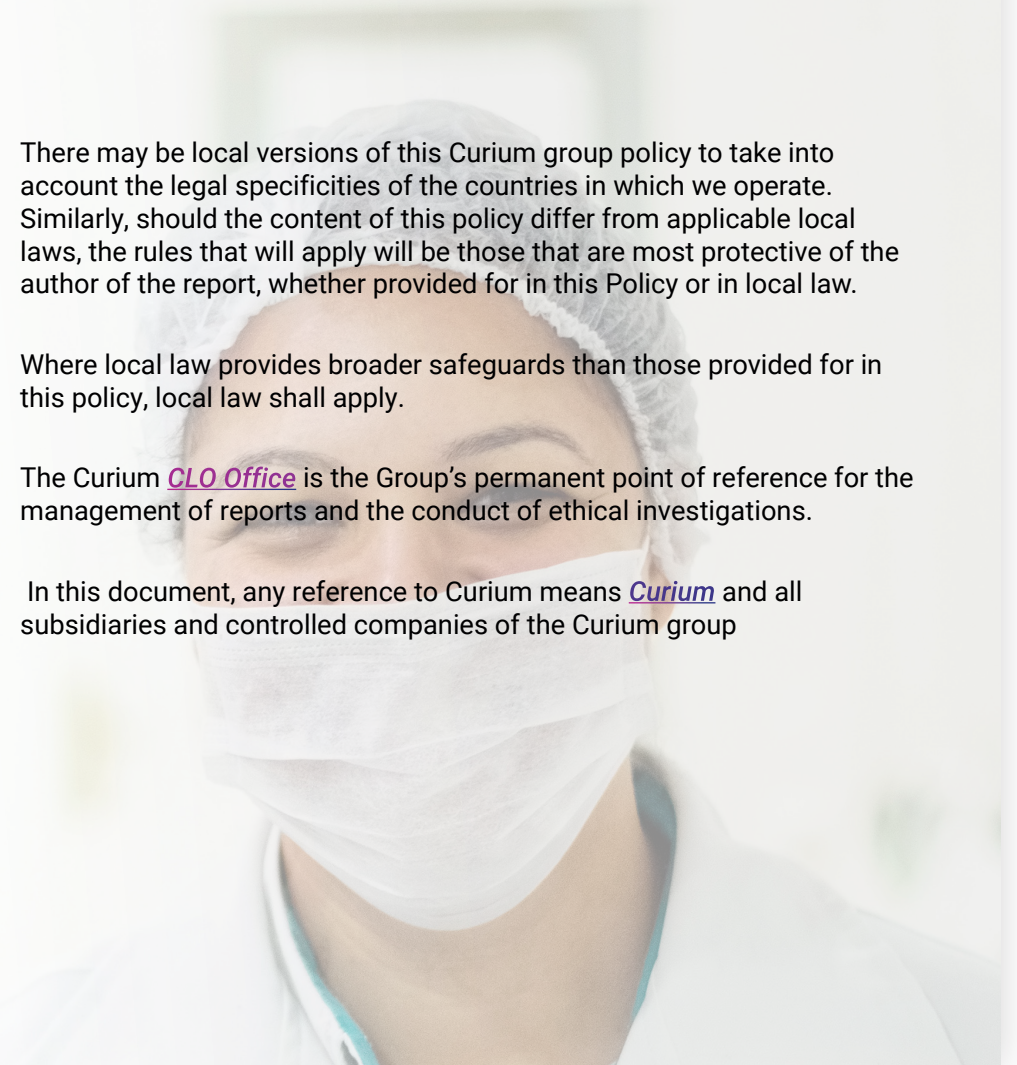


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1. WHAT FACTS CAN BE REPORTED?

The purpose of this Policy is to invite any Curium employee, partner or other stakeholder to report:

- Any suspected, actual or proven violation of the Curium Code of Conduct or any applicable Curium Compliance Policy;
- Actual or suspected criminal activity;
- A violation of law, regulations, US, UK, EU law, or any other applicable international law
- A situation that could pose a threat or harm to the public interest
- An infringement or risk of infringement of human rights and fundamental freedoms
- A threat or risk of harm to the health or safety of persons or the environment;
- Intentional concealment of any of the aforementioned acts or facts
- Acts of retaliation related to reporting or participating in the processing.

The report must relate to facts or acts in connection with the activity of Curium, which have occurred or are likely to occur.



Take note

Any other concerns outside the above definition will not be considered a report under this Policy. It may nevertheless be shared with Curium's human resources or management for possible follow-up.

By way of illustration, below are some examples of facts that could be reported if they were found or suspected in relation to Curium's activities:

Category	Facts or behaviours
Human Rights and Fundamental freedoms	• Child labour • Forced labour and all forms of human trafficking • Bullying, racist, homophobic, discriminatory comments • Sexual harassment, sexist behaviour
Health and Safety of Persons	• Failure to comply with regulations and/or internal rules applicable to the handling of hazardous products at Curium or within its supply chain • Non-compliance with the rules applicable to work in dangerous conditions at Curium or within its supply chain • Lack of rules and/or procedures in place at the workplace and/or in the supply chain • Radioactive contamination
The environment	• Air, soil and water pollution • Pollution in the transport of dangerous goods
Economic and financial interests	• Private or public corruption • Conflict of interest • Infringement of the competition/antitrust rules • Overview of economic sanctions • Internal or External Fraud • Misappropriation of funds, money laundering



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2. WHO CAN MAKE A REPORT?

Any natural person who appears in one of the categories of person listed below is authorized to make a report under this Policy:

- A Curium employee currently working or having worked for the group, regardless of the nature of their employment contract;
- A person who has applied for employment with Curium or a future employee whose employment contract has not yet begun;
- A shareholder, partner or holder of voting rights at the general meeting of Curium;
- A director, corporate officer, member of a board of directors or a governing body of
- Curium or one of the group's entities, including non-executive members, present or past;
- Occasional partners, interns, temporary workers, contractors, whether remunerated or not, and any person working under the supervision of Curium's subcontractors or contractors;
- Curium's suppliers and external partners (subcontractors, service providers, etc.)
- Customers and patients using Curium products;





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3. CONDITIONS OF VALIDITY OF A REPORT

To be valid, a report must be made in good faith, and without any financial compensation.

A report will be deemed to be made in good faith if the person making the report has serious reasons to believe that the information reported is true at the time of the report. If it later appears that the reported information is inaccurate but that the report was made in good faith, the author of the report will be protected from any sanctions and other retaliatory measures.

Conversely, anyone who reports information they know or have good reason to believe is false will not be protected under this Policy, to avoid any unfounded or abusive reporting.

Making an unfounded or abusive report is contrary to the values set forth by Curium and any misuse and/or misuse of the reporting channels constitutes a violation of this Policy and may result in disciplinary action.

The information to be provided in support of a report is set out in [Appendix 1](#) of this Policy.





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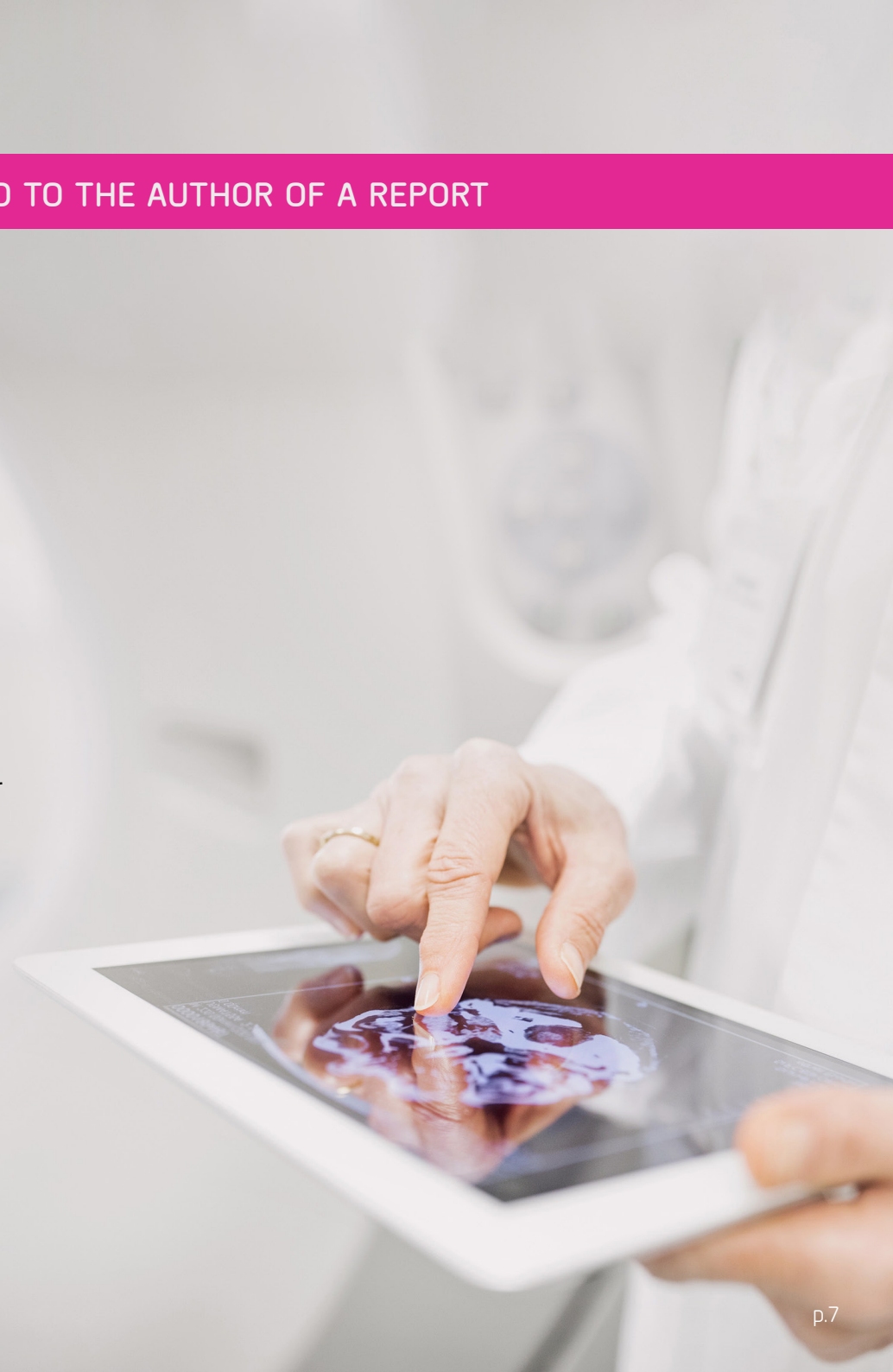
4. CONDITIONS OF PROTECTION GRANTED TO THE AUTHOR OF A REPORT

Persons who make a report through one of the reporting channels implemented by this Policy benefit from a guarantee of confidentiality as well as protection against any retaliation, if they meet the following conditions:

1. The report must be made in good faith (see [section 3](#) above) and without financial compensation;
2. The report shall be made by a natural person who has had personal knowledge of the facts reported or to whom the facts have been reported in the course of his their professional activity.

The protection of the reporting party is extended

- a. Facilitators (any natural or legal person who helps the author of the report to issue their report);
- b. To individuals in connection with the author of the report (that is, all those who may be subject to reprisals from the employer, their client or the recipient of their services) and;
- c. To legal entities for which the reporting party works or with which it is related in a professional context or which it controls.





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5. HOW TO REPORT

A person wishing to make a report can always contact their direct manager, their reference person in the human resources department, a member of the legal department or the [Compliance Office](#) of Curium. In such a case, the author of the report will benefit from the same guarantees and protections provided under this Policy provided that its report is made in good faith.

However, if the person wishing to make a report prefers to use the dedicated channel provided by Curium, he/she can do so by making a report on the dedicated online platform available at [the following address](#).

In this case, the report will then be sent to the CLO Office which will determine the person of the legal department or the Human Resources Department best qualified to handle the report.

Depending on local legislation, other internal referents may receive reports as part of their duties, such as in France staff representatives, sexual harassment referents or members of the CSE).

For third parties, they can contact their usual contact at Curium or contact the [CLO Office](#) at compliance.office@curiumpharma.com.

Any person who receives a report without being authorized under this Policy to manage its processing must inform the CLO Office of Curium and/or invite the person who sent the report to contact the CLO Office of Curium via the dedicated platform.

a) Internal reporting channel

Curium has set up an alert and monitoring channel that can be used via an online portal provided by the Danish company Whistleblower Software ApS whose registered office is in Kannikegade 4 to 8000 Aarhus C (Denmark) (the «**Whistleblower Platform**»).

The Whistleblower Platform provides any person wishing to make a report with a unique and direct means for the collection and processing of reports relating to facts as listed in Section 1 of this Policy.

The Whistleblower Platform is accessible from any device by clicking on this link: [Whistleblower Platform](#)



Take note

The report can be made on the [Whistleblower Platform](#) in writing or orally, leaving a voice message.

Access to information transmitted via the whistleblowing channel is strictly limited to the CLO Office, the person designated to follow up on the report, and, where appropriate, to Curium's external legal advice.



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5. HOW TO REPORT (CONTINUED)

b) Confidentiality and anonymity

The author of the report may decide to report anonymously or to communicate their personal data, which will be treated with the utmost confidentiality and in strict compliance with the rules applicable to the protection of personal data.

In the case of anonymous reporting, the possibility of its processing under this system will depend in particular on the existence of sufficiently detailed factual elements and if anonymity makes it impossible to process the report, its author will be informed by the anonymous dialog on the [*Whistleblower Platform*](#).

It is specified that it is generally preferable for the author of a report to identify himself at the time of the report. Their identity will be treated confidentially and will not be disclosed to the reported or suspected individual, unless otherwise required by law or with the consent of the reporting person.

c) Handling of reports

Roles and Responsibilities

Curium is committed to ensuring that all reports are treated rigorously, objectively, impartially and within a reasonable time.

The [*CLO Office*](#) is the single point of contact designated within Curium to handle reports made on the Whistleblower Platform. The CLO Office will be assisted where appropriate by a member of Curium's Human Resources Department and/or by external legal advice.

The author of the report can indicate in their alert whether the CLO Office or a member of the Human Resources Department is personally involved in the report made. In this case, the report will not be forwarded to that member and the identity of the report author, facilitator or third party will not be disclosed to that member.

All reports will be acknowledged within a maximum of 7 days. Then, the processing of the reports will in principle take place within 3 months from the sending of the acknowledgement of receipt.

Within the same period of 3 months, a feedback will be sent to the author of the report who will be informed of the actions planned or undertaken following their alert and the reasons for these actions.



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5. HOW TO REPORT (CONTINUED)

d) Initial assessment of reports

Any report will first undergo an initial assessment, in particular to ensure that the report is admissible under this Policy (see [Section 1](#)). If necessary, the person in charge of processing will contact the person who made the report to obtain additional information. If the person making the report has not left any contact details to be contacted, he or she must regularly log in to the [Whistleblower Platform](#) to check if he or she has been sent an additional request for information.

e) Investigation following a report

Once the initial assessment is completed, the CLO Office or any other person in the CLO Office or the Human Resources Department will investigate the facts indicated in the alert.

As part of this investigation, the person in charge of processing is authorized to take the necessary measures to confirm the allegations such as the collection of evidence, the hearing of the various stakeholders or witnesses, the verification of documents, conduct interviews with affected employees and access or gain access to the affected premises.

On the basis of the information gathered during the investigation, the CLO Office carries out a legal analysis of the facts to determine whether a violation of the law, the Curium Code of Conduct and/or Compliance Policies has actually taken place and is issuing an investigation report summarizing the facts and evidence that confirms or invalidates the report.

If necessary, the report is forwarded to the relevant management so that it can take appropriate corrective action.

These measures may include disciplinary measures, dismissal, reporting to the police and/or competent authorities, adoption of new internal procedures to prevent the renewal of facts and/or behaviour...

It is recalled that Curium undertakes to make every effort to conduct and close any investigation that would be opened under this Policy within three months from the acknowledgement of receipt of the report, and to keep the [reporter](#) regularly informed of the progress of the investigation.

f) Information and protection of persons affected by a report

When an individual is the subject of a report, it is important that any action taken under this Policy take into account the individual's rights, including labour and privacy law.

- If this person is to be further investigated, they will be informed in a timely manner based on the needs of the investigation and in accordance with applicable legal provisions.
- If the investigation does not reveal any wrongdoing, the individual will need to be protected from retaliation for being reported. The same protection should be afforded to those who are reported in bad faith.
- If the reported facts are confirmed and the investigation leads to the adoption of sanctions against the person concerned, the latter must be protected from any negative consequences that would go beyond the sanction imposed.



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6. SECURE DATA STORAGE

Any information provided in connection with a report in accordance with this Policy would be treated with the strictest confidentiality in compliance with the applicable legal provisions. Access to the information that will be provided on the [Whistleblower Platform](#) will only be accessible to the author of the report, the [CLO Office](#) and, where applicable, the person in charge of processing the report and, if necessary, to Curium's external legal advice.

The Whistleblower Platform is certified in compliance with the provisions of the GDPR and the most demanding IT security standards (ISO 27001).



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7. EXTERNAL REPORTING

Reporting authors are invited to make priority use of internal reporting channels so that the situation reported within the Group can be remedied as quickly as possible, while granting the reporting party enhanced confidentiality guarantees.

The author of the report may, however, if he wishes to speak to a judicial or administrative authority, to professional orders, to the defender of rights or to any other competent body. The list of competent bodies in the jurisdictions where we operate is attached in [Appendix 2](#).



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8. PUBLICATION AND OPERATIONAL REVIEW OF THE ALERT SYSTEM.

This Policy is adopted by the Curium [CLO Office](#) on 01/12/2024. It will be communicated to all Curium employees and will also be published on the Curium website to ensure that it can provide clear information to potential users.

This Policy will be reviewed at least every [3] years by the CLO Office to ensure that it can best meet the needs of its users and/or remain in compliance with applicable legal and regulatory changes.





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9. DEFINITION

The following terms, which are repeated in the Policy, are defined as follows:



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Compliance Office : This is a group of lawyers composed of the Group General Counsel (Chief Legal Officer), the Deputy Chief Legal Officer (Directeur Juridique Groupe Adjoint) and the Corporate Legal Counsel (Legal Counsel – Corporate) of Curium and who is in charge of, collectively, oversee any compliance issues within the Curium Group.

CLO office : mean Chief Legal Officer et le Deputy Chief Legal Officer

Whistleblower Platform : means the reporting platform developed by Whistleblower Software and which allows any employee or partner of Curium to make an oral or written report, anonymous or not, to the attention of the CLO Office of Curium, for follow-up and possible investigation.

Employee, employee or worker : any natural person bound by an employment contract to a company of the Curium group, within the meaning of Article 45 (1) of the Treaty on the Functioning of the European Union.

Reporter : means any person who reports facts or information that falls within the scope of this Policy, whether or not they are employed by Curium.



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Information to be provided in support of a report

Information submitted in the context of a report must be factual and have a direct link with the subject of the report.

The author must describe, in an objective and detailed manner, the facts that make it possible to understand the content and purpose of his/her report, and in particular:

- When were the facts that are reported
- How he became aware of these facts (directly or indirectly)
- If these facts have already been reported to other
- If measures have already been taken to remedy the situation
- Identity and function of persons involved
- If people have witnessed the events that are reported
- How to contact him

The person making the report must also attach any document that could support the facts being reported.

In case of doubt, the author must specify that these are alleged facts.

Where the information reported has not been obtained in the course of his/her professional activity, the person making the report must have had personal knowledge of it.

If the facts that are the subject of a report give rise to legal action, the procedure for processing the report will be considered inadmissible.

If the report is inadmissible, the author is informed in writing, as well as the reasons why the [CLO Office](#) considers that the report does not comply with the conditions provided by law and this Policy. Where appropriate, he shall be informed of the other means by which he may express his/her concerns.



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List of competent
authorities

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United Kingdom

The full list of prescribed persons and bodies can be found here: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

It is strongly recommended that employees seek advice before raising any concerns externally. Employees can obtain free confidential advice on whether and how to raise a concern via the helpline run by the independent whistleblowing charity, Protect.

Website: <https://protect-advice.org.uk/advice-line>

Tel: 020 3117 2520.

Protect also have a list of prescribed regulators for reporting certain types of concerns.

United States of America

(relevant states for Curium)

In addition to Curium's Whistleblower Hotline, through which employees can report matters anonymously to Curium's Compliance Office, employees may also refer certain matters to the following organisations:

1. Missouri Department of Labor

Website: <https://labor.mo.gov/contact-labor>

2. Indiana Department of Labor

Website: <https://www.in.gov/dol/>

3. Indiana Civil Rights Commission

Website: <https://www.in.gov/icrc/>



Contact: Compliance.Office@curium.com
To raise a concern, [click here](#)