



Integrity procedure - for reporting irregularities

Do you think that something is not being done by the rules in Mediq? Report it in accordance with this integrity procedure.

If possible, report an irregularity to your manager, HR business partner, or any member of the Legal Department.

If that is not possible or desirable, you can also use the freephone number and website.

Introduction

At Mediq, we are guided and inspired by our vision to be the partner of choice to improve the outcomes and affordability of care for people living with chronic diseases. Our plans are ambitious and our people are driven. Each new day we ask ourselves: how can we provide even better and affordable care?

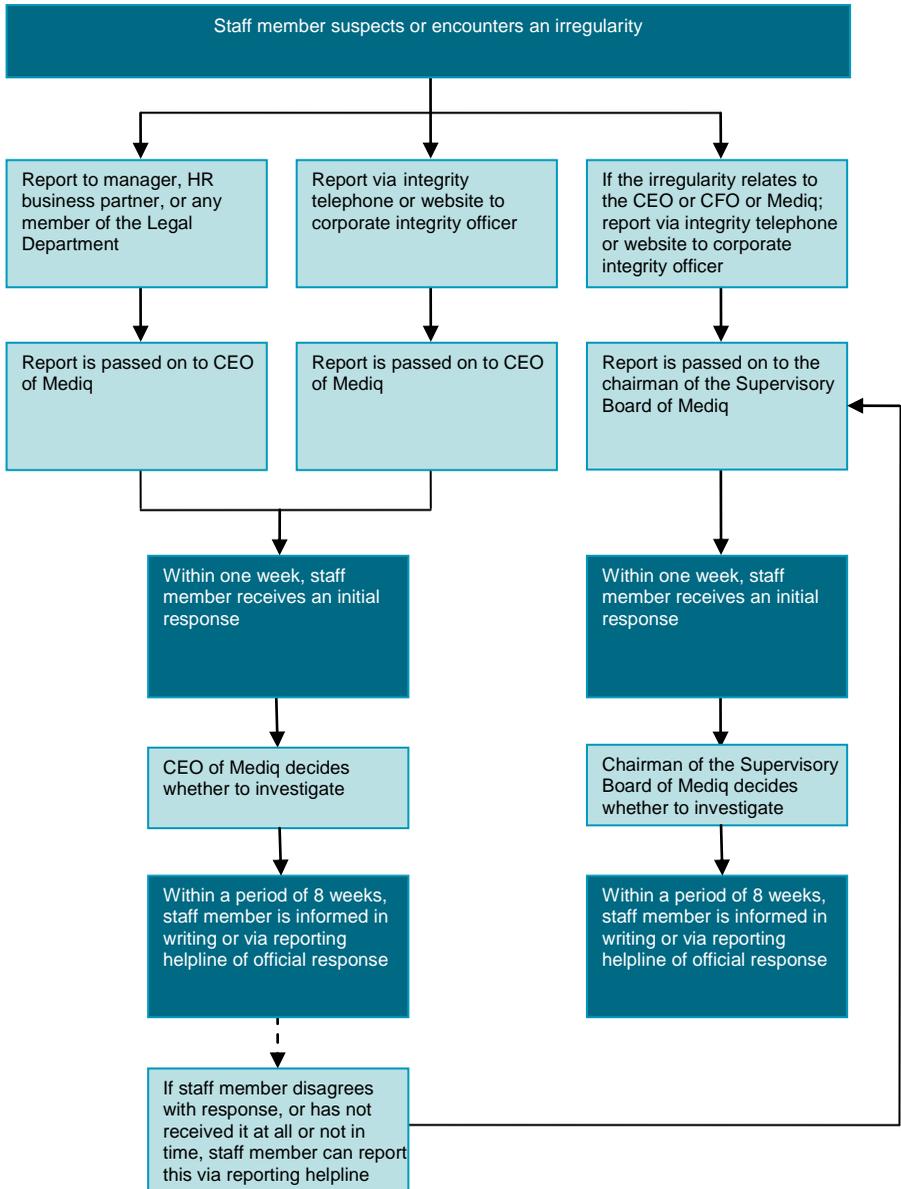
Our values describe and stimulate a long term vision on doing business, building trust and engaging in sustainable relationships. They allow us to lead boldly, and with an entrepreneurial spirit to provide healthcare solutions that offer the best outcomes and perspectives for all stakeholders in the patient journey.

By doing business in a responsible and sustainable way we are what we are today, a trusted partner to healthcare professionals, payors and patients. The foundation of our business principles is integrity: we do the right thing. We are open, forthright and consistent in our work. With everyone we interact with. We are honest about our intentions and accountable for everything we do. We put high expectations on ourselves to meet these principles. Our customers, business partners and the society in general have the same high expectations.

To help ensure we meet our commitments, should you suspect or encounter any improper activity, such as a violation of Mediq's Code of Conduct or a violation of laws and regulations, we want to be the first to know so that we can immediately address the situation. For this reason, you may report the issue to your manager, HR business partner, or any member of the Legal Department. If this is not possible or desirable, the issue can be reported (anonymously if desired) via the integrity telephone line or website (see last page), operated by a third party helpline provider. Anonymous reports can only be made via the integrity telephone or website. Other anonymous reports will not be considered, as it would not be possible to request further information. The corporate integrity officer monitors the integrity telephone and website for reports.

Reports will be passed on to the CEO of Mediq who decides whether or not to launch an investigation. The procedure is described in detail in this document. It is the policy of Mediq to protect conscientious employees against retribution or retaliation for good faith disclosures of actual or potential irregularities.

Chart of procedure



Integrity procedure – official regulations

Definitions

Article 1

The following definitions apply in these regulations:

- company: the company Mediq Holding BV and all (group) companies affiliated with it in Europe (for all Mediq affiliates in the US the Byram procedures apply);
- staff member: a person who, as an employee or otherwise (consultants, temporary workers, contractors), works or has worked for the company;
- manager: the person who directly supervises the staff member;
- corporate integrity officer: the person designated as such by the company;
- irregularity: a matter (including a reasonable suspicion) relating to the company in connection with:
 - a. a violation of Mediq's Code of Conduct or other Mediq policies;
 - b. a violation of laws and regulations; or
 - c. the actual or imminent deliberate withholding, destruction or manipulation of information about those facts.
- Integrity line: free telephone number or website, operated and administrated by an independent organisation.

Scope

Article 2

1. These regulations, as amended from time to time, apply without restriction to all staff members of the company.
2. These regulations, as worded at the time of the termination of work for the company, will continue to apply without impairment to (former) staff members even beyond the termination of their work for the company.

Procedure

Article 3

1. The staff member should preferably report an irregularity to the manager, HR business partner, or any member of the Legal Department. If this is not possible or desirable, the staff member can report the irregularity to the corporate integrity officer via the integrity line. The staff member is not permitted under any circumstances to disclose the facts concerned externally, unless the situation as referred to in article 7 paragraph 1 and/or 2 of these regulations occurs.
2. Reports can if necessary be made anonymously via the integrity line. Anonymous reports not made via the integrity line will not be considered, as it would not be possible to assess the correctness of the report, or to request further information.
3. The manager, HR business partner, or member of the Legal Department will document the report in writing, together with the date on which it was received. The staff member will receive a copy. If a report was made via the integrity line, the corporate integrity officer will provide the staff member with a copy of the report at the latter's request.
4. The manager, HR business partner, or member of the Legal Department or the corporate integrity officer will directly inform the CEO of Mediq by providing a copy of the written report, or a copy of the report made via the integrity line.
5. As soon as possible after receipt of a report, the CEO of Mediq will decide to launch an investigation or, if there are good reasons for this, not to follow through on the report. The CEO of Mediq can instruct a third party, whether or not working within the company, including the corporate integrity officer, to perform an investigation under the responsibility of the CEO of Mediq. The CEO of Mediq can decide not to launch an investigation, if insufficient information is available for an investigation and it is not possible to obtain additional information or if it has been established that the report has been made in bad faith.
6. Both the staff member who reports the irregularity and the person to whom the irregularity is reported will treat the report in the strictest confidence. Without the approval of the CEO of Mediq, no information will be provided to third parties inside or outside of the company. If information is provided, the name of the staff member will not be disclosed.

Article 4

1. Within one week after the report is received, the staff member will receive from the CEO of Mediq or his designee meant in article 3 paragraph 5, in writing or via the integrity line in the case of a report made via the integrity line, an initial response.
2. Within a period of eight weeks after the report is received, the staff member will be informed by the CEO of Mediq, in writing or via the integrity line in the case of a report made via the integrity line, of the official response by the CEO of Mediq. This will include a statement of the steps the report has resulted in.
3. If the official response cannot be provided within eight weeks the staff member will be informed accordingly by the CEO of Mediq, in writing or via the integrity line in the case of a report made via the integrity line, and the timeframe within which the official response can be expected will be stated.

Article 5

1. Staff members can report the irregularity via the integrity line to the chairman of the Supervisory Board if:
 - a. the irregularity relates to the CEO or CFO of Mediq;
 - b. they disagree with the official response from the CEO of Mediq to their report and they have lodged an objection to this with the CEO of Mediq, and the matter has not been resolved;
 - c. the time taken to consider their report is much longer than eight weeks and their objection to that is not accommodated;
 - d. they consider the timeframe of eight weeks to be unreasonably long for their specific report and they have lodged an objection to this with the CEO of Mediq, and he has not proposed a shorter, more reasonable timeframe;
 - e. after a reasonable period has passed since the official response was provided, the irregularity has not been eliminated.
2. Reports to the chairman of the Supervisory Board must be made via the integrity line. The corporate integrity officer will directly inform the chairman of the Supervisory Board by providing a copy of the report made via the integrity line. The corporate integrity officer will provide the staff member with a copy of the report at the latter's request. If the staff member has already reported the irregularity previously, reference will be made in the written report to the original report.
3. As soon as possible after receipt of a report, the chairman of the Supervisory Board will decide to launch an investigation or, if there are good reasons for this, not to follow through on the report. The chairman of the Supervisory Board can instruct a third party, whether or not working within the company, including the corporate integrity officer, to perform an investigation under the responsibility of

the chairman of the Supervisory Board. The chairman of the Supervisory Board can decide not to launch an investigation, if insufficient information is available for an investigation and it is not possible to obtain additional information or if it has been established that the report has been made in bad faith.

4. Both the staff member who reports the irregularity and the person to whom the irregularity is reported will treat the report in the strictest confidence. Without the approval of the chairman of the Supervisory Board, no information will be provided to third parties inside or outside of the company. If information is provided, the name of the staff member will not be disclosed.

Article 6

1. Within one week after the report is received, the staff member will receive from the chairman of the Supervisory Board or his designee meant in article 5 paragraph 3, in writing or via the integrity line an initial response.
2. Within a period of eight weeks after the report is received, the staff member will be informed by the chairman of the Supervisory Board, in writing or via the integrity line, of the official response by the chairman of the Supervisory Board. This will include a statement of the steps the report has resulted in.
3. If the official response cannot be provided within eight weeks the staff member will be informed accordingly via the integrity line and the timeframe within which the official response can be expected will be stated.

External reports

Article 7

1. Only after the staff member has completed the procedure as referred to in articles 3 to 6 of these regulations and compliance with that procedure has failed to eliminate the irregularity, the staff member can, depending on all circumstances of the case, externally disclose the facts in a suitable and proportionate manner. In doing so the staff member must not lose sight of the company's interests.
2. Only in the event of a material and urgent danger to public interest that requires immediate external disclosure, the staff member can, depending on all circumstances of the case, in derogation from article 3 paragraph 1 of these regulations, externally disclose the facts in a suitable and proportionate manner. In doing so the staff member must not lose sight of the company's interests.

Legal status

Article 8

1. If a staff member has reported, in good faith, an irregularity in accordance with the integrity procedure the staff member will not be disadvantaged in his or her position in any way as a result of this.
2. If an investigation is launched into a staff member, the investigation will be conducted in accordance with applicable laws and regulations.
3. The corporate integrity officer will not be disadvantaged in any way in his or her position as a result of acting as such on the basis of these regulations.
4. If a staff member acts in breach of these regulations, the staff member may be held liable by the company in accordance with applicable laws and regulations for all damages the company has suffered, without prejudice to the other rights of the company, including disciplinary actions up to and including termination of employment.

Effective date

Article 9

These regulations will become effective on 1 January 2017 and thereby replace the previous regulations.

Belgium

Freephone number 0800 71365

Website <https://www.speakupfeedback.eu/web/trbtap/be>

Mediq-access code: 67382

Denmark

Freephone number 8088 5638

Website <https://www.speakupfeedback.eu/web/trbtap/dk>

Mediq-access code: 02884

Estonia

Freephone number 800 0044 208

Website <https://www.speakupfeedback.eu/web/trbtap/ee>

Mediq-access code: 18559

Finland

Freephone number 08001 13031

Website <https://www.speakupfeedback.eu/web/trbtap/fi>

Mediq-access code: 92280

France

Freephone number 0800 908810

Website <https://www.speakupfeedback.eu/web/trbtap/fr>

Mediq-access code: 16007

Germany

Freephone number 0800 1801 733

Website <https://www.speakupfeedback.eu/web/trbtap/de>

Mediq-access code: 75390

Hungary

Freephone number 0680 981 359

Website <https://www.speakupfeedback.eu/web/trbtap/hu>

Mediq-access code: 96070

Latvia

Freephone number 8000 2490

Website <https://www.speakupfeedback.eu/web/trbtap/lv>

Mediq-access code: 74222

Lithuania

Freephone number 880090006

Website <https://www.speakupfeedback.eu/web/trbtap/lt>

Mediq-access code: 59708

Netherlands

Freephone number 0800 022 29 31

Website <https://www.speakupfeedback.eu/web/trbtap/nl>

Mediq-access code: 72330

Norway

Freephone number 800 18 333

Website <https://www.speakupfeedback.eu/web/trbtap/no>

Mediq-access code: 18669

Sweden

Freephone number 020 798813

Website <https://www.speakupfeedback.eu/web/trbtap/se>

Mediq-access code: 62220

Switzerland

Freephone number 0800 561 422

Website <https://www.speakupfeedback.eu/web/trbtap/ch>

Mediq-access code: 51587

USA

Freephone number 1 866 250 6706

Website <https://www.speakupfeedback.eu/web/trbtap/us>

Mediq-access code: 44638