	<b>COOK MEDICAL MANAGEMENT SYSTEM (CMMS) DOCUMENT</b>			
	<b>Document Number:</b> D00533875	<b>Revision:</b> 003	<b>QMS Owner:</b> Cook Medical Holdings LLC	<b>Page:</b> 1 of 5
	<b>Title:</b> Global Whistleblowing Internal Standard			

## 1.0 PURPOSE

The purpose of this internal standard is to establish Cook Medical requirements for handling the reporting of whistleblowing concerns in accordance with Cook Medical Non-Retaliation policy and External Applicable Standards (EAS).

## 2.0 SCOPE

This internal standard applies to a wide range of parties, including employees of Cook Medical ("Cook"), and companies with which Cook does business. Further details regarding parties to whom this internal standard applies can be found in the relevant country appendix.


## 3.0 ROLES AND RESPONSIBILITIES

Role	Responsibility
<b>Employee</b>	<ul style="list-style-type: none"> <li>• Be aware of this internal standard</li> <li>• Complete training on this internal standard</li> <li>• Report breaches of Country Laws, Written Standards and External Applicable Standards (EAS)</li> </ul>
<b>Ethics &amp; Compliance (E&amp;C)</b>	<ul style="list-style-type: none"> <li>• Assist with the roll out of communications and training regarding this internal standard</li> <li>• Review and manage Whistleblowing reports in accordance with Country Laws</li> <li>• Apply the Non-Retaliation policy which aims to protect those who raise Whistleblowing concerns or make Whistleblowing reports from retaliation (as provided in section 6.6)</li> </ul>
<b>HR</b>	<ul style="list-style-type: none"> <li>• Assist with the roll out of communications and training regarding this internal standard</li> <li>• Manage, review, and escalate in accordance with this internal standard Whistleblowing concerns that are received through HR reporting avenues including but not limited to: walk ins, emails, and phone calls</li> <li>• Promote and apply the Non-Retaliation policy which aims to protect those who raise Whistleblowing concerns or make Whistleblowing reports from retaliation (as provided in section 6.6)</li> </ul>
<b>Supervisors and Managers</b>	<ul style="list-style-type: none"> <li>• Escalate Whistleblowing concerns and reports to HR/E&amp;C or through the Cook E&amp;C Helpline in accordance with this internal standard</li> <li>• Promote and apply the Non-Retaliation policy which aims to protect those who raise Whistleblowing concerns or make Whistleblowing reports from retaliation, (as provided in section 6.6)</li> </ul>

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#### 4.0 REFERENCES

- Non-Retaliation Policy
- Cook Code of Conduct
- Cook Supplier Code of Conduct
- [Cook E&C Helpline](#)

#### 5.0 TERMS

Term	Definition
<b>Case Management System (CMS)</b>	Central repository for tracking questions, concerns, and issues raised through the Cook E&C Helpline and documenting the investigation and outcome(s).
<b>Cook E&amp;C Helpline (Helpline)</b>	Global system used by Cook for employees and those outside the company to submit concerns confidentially, and in certain circumstances, anonymously. The concern may be submitted using either the country toll-free telephone number or the web portal.
<b>Country Laws</b>	Laws enacted by countries on the protection of whistleblowers. For further details on applicable Country laws refer to the relevant country appendix.
<b>External Applicable Standards (EAS)</b>	Laws, regulations, regulatory guidance, and standards (e.g., ISO, ANSI, AAMI), industry guidance and best practices, and ethical best practices applicable to Cook's business activities.
<b>Helpline Administration Team</b>	E&C employees who manage the operation of the Helpline, including tasks such as assigning cases, updating required fields, reporting etc.
<b>Retaliation</b>	An action performed directly or through others, that is aimed to deter a reasonable person from engaging in a protected activity or is done in retribution for engaging in a protected activity. Retaliation can take many forms (see Section 6.6.2 examples).
<b>Whistleblower</b>	A party that reports a Whistleblowing concern.
<b>Whistleblowing (sometimes referred to as Protected Disclosure)</b>	The reporting of a concern or information relating to wrongdoing, illegal practices, or unethical conduct regarding breaches of certain areas of law described in applicable Country Laws.
<b>Written Standards</b>	Documents, such as policies and procedures, communicating requirements for mandatory activities, minimum expectations for employees, and organizational rules, which are developed internally to govern Cook's business activities (e.g., Cook Group Global Code of Conduct).


#### 6.0 REQUIREMENTS

- 6.1 Cook is committed to maintaining an open culture with the highest standards of honesty and accountability where concerns can be reported in confidence.
- 6.2 This procedure is intended to encourage the reporting of Whistleblowing concerns pursuant to Country Laws and applicable Cook Written Standards and EAS without fear of retaliation or penalization or threat of less favorable treatment, discrimination, or disadvantage.

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6.3 A Whistleblowing concern relates to information about a relevant wrongdoing. If an employee has a concern or issue in relation to their own employment or personal circumstances in the workplace, they should discuss this with their Supervisor/Manager/Director or consult the applicable Grievance and Dispute Procedure for their country.

## 6.4 Reporting Procedure

6.4.1 Whistleblowing concerns can be raised internally by speaking to either a supervisor/manager, HR, E&C or via the Cook E&C Helpline.

6.4.2 Once a Whistleblowing concern has been raised to a supervisor/manger, HR, or E&C, the report recipient is responsible to review and escalate the report to E&C or through the Cook E&C Helpline. This should be done as quickly as possible, no later than 3 working days after initial receipt of the report.

6.4.3 Whistleblowing concerns will be managed through the Case Management System (CMS) in accordance applicable Country Laws.

6.4.4 Subject to Country Laws, a Whistleblowing concern may be reported anonymously.

6.4.5 Whistleblowing concerns may be reported externally to a relevant competent authority or other third party. These external reporting channels may differ from one country to another. For further information on country specific external reporting channels refer to the country appendix.

## 6.5 Handling Reports

6.5.1 Whistleblowing concerns will be managed through the Case Management System (CMS) for central administration purposes. This allows Cook to handle reports in a secure manner and facilitates communication with the Whistleblower, while maintaining confidentiality and if applicable the Whistleblower's anonymity.


6.5.2 Whistleblowing concerns will be dealt with in confidence. Only a limited number of appropriate, designated Cook employees and Helpline staff will have access to the report.

6.5.3 Once a Whistleblowing concern has been added to the CMS, Cook's E&C Helpline Administration Team will review it. The Helpline Administration Team are a small number of HR and E&C Team members.

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- 6.5.4 Whistleblowing concerns are assigned to trained investigators dependent on the issue type, location, and the subject of the report.
- 6.5.5 Investigators will be competent, qualified, and impartial.
- 6.5.6 Timelines for acknowledgement by Cook of receipt of a Whistleblowing report are set out in the country appendix.
- 6.5.7 Throughout the investigation, the investigator(s) will, where possible and as appropriate, provide follow-up to the Whistleblower on the status of the investigation. A reasonable timeframe for completion of an investigations is three (3) months. If this is not possible then the Whistleblower, should be informed.
- 6.5.8 Concerns reported that do not meet the legal criteria for a Whistleblowing concern may not be treated in the manner stated above. The reporter will be informed if their reported concern is considered within the scope of the applicable Country Laws and as a consequence what procedures will apply to their report. For further information, refer to E&C Helpline Procedure.
- 6.5.9 Cook takes steps to ensure that the personal data collected in accordance with this procedure is adequate, relevant, not excessive, and processed for the limited purposes of administering this procedure and investigating reports. Cook has the appropriate agreements in place with the Cook E&C Helpline CMS provider in relation to the transfer of data, and the privacy statement on the Helpline also support this.
- 6.5.10 Documentation related to reports and subsequent investigations will be stored in the CMS as laid out by the applicable Record Retention Schedule.


## 6.6 Protection and Support of Whistleblowers

- 6.6.1 Whistleblowers who report a concern in good faith regarding a Whistleblowing concern are protected against retaliation.

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6.6.2 Forms of Retaliation can include, but are not limited to the following:

- Suspension, lay-off, termination or equivalent measures
- Decisions relating to a person's work assignments, vacation, or promotion or advancement opportunities
- Reduction of salary
- Withholding of training
- Giving a negative performance evaluation
- Coercion, intimidation, harassment, or ostracism
- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income
- Early termination or cancellation of a contract for goods or services
- Threat to engage in retaliation

6.6.3 Cook strictly prohibits Retaliation against Whistleblowers for reporting or inquiring in good faith about activity that is reasonably believed to be wrongful or unlawful, or for participating in an investigation. Any employee who participates in retaliatory action may be subject to disciplinary action, up to and including dismissal. Further information on Cook's non-retaliation requirements are set out in the Cook Group Global Code of Conduct and in the Non-Retaliation policy.

6.6.4 Information in relation to the rights of Whistleblowers is provided by relevant authorities and appointed persons pursuant to applicable Country Laws, details of which are set out in the country appendices.

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