



Policy	Whistleblower Policy
Date Effective:	01.03.2024
Document Number	1

1. Introduction:

R-Health is dedicated to conducting its business with honesty, integrity, and compliance with all applicable laws and regulations. We encourage employees, contractors, vendors, and stakeholders to report any suspected violations. This Whistleblower Policy provides mechanisms for reporting concerns in good faith without fear of retaliation.

2. Scope:

This policy applies to all employees, contractors, vendors, suppliers, customers, and stakeholders associated with R-Health.

3. Reporting Mechanisms:

R-Health provides several accessible and confidential avenues for reporting concerns:

1. Direct Reporting: Report concerns to your supervisor, manager, or another member of management. If the concern involves management, report it to the next level of management or Human Resources.
2. Email Reporting: Report concerns via a designated email monitored by the Compliance Officer or an authorized party.
3. In-Person Reporting: Schedule confidential meetings with the Compliance Officer, Human Resources, or another appropriate party.
4. Written Reporting: Submit written reports via internal mail or designated drop-boxes in R-Health facilities.
5. Online Forms: Use online reporting forms accessible through the company's intranet or website.
6. Telephone Reporting: Report concerns by phone to designated hotline numbers provided by R-Health.

4. Whistleblower Protections:

R-Health is committed to creating a culture where individuals feel safe reporting concerns without fear of retaliation.

1. Non-Retaliation Policy: Retaliation against individuals who report concerns in good faith is strictly prohibited. Disciplinary action will be taken against those found to retaliate.
2. Confidentiality: The identity of whistleblowers is protected and disclosed only to those involved in the investigation on a need-to-know basis.
3. Anonymous Reporting: Reports can be made without revealing identities to prevent reprisal.
4. No Waiver of Rights: Rights under applicable whistleblower protection laws are respected, allowing external reporting if necessary.
5. Support and Assistance: Access to counseling, legal assistance, and other resources is provided.



6. Regular Training and Awareness: Employees are educated about their rights and obligations under the policy.

7. Escalation Process: Individuals experiencing retaliation should report it to Human Resources or the Compliance Officer immediately.

5. Investigation Process:

1. Receipt of Report: Reports are documented and promptly initiate the investigation process.
2. Assigning Investigative Team: A team from Compliance, Human Resources, and Legal departments is assigned and may include external experts if necessary.
3. Gathering Evidence: Comprehensive review of documents, records, and interviews is conducted.
4. Confidentiality and Non-Retaliation: Confidentiality and non-retaliation are maintained throughout the investigation.
5. Impartial Analysis: Objective evaluation of evidence is performed.
6. Conclusion and Findings: Validity of the report and any violations are determined.
7. Corrective Action and Remediation: Appropriate disciplinary measures and remedial actions are taken to prevent recurrence.
8. Communication and Follow-Up: Transparent communication with relevant stakeholders, including feedback to the reporting individual, is provided.

6. Resolution and Corrective Action:

1. Assessment of Findings: Findings are reviewed to determine corrective measures.
2. Determining Corrective Measures: May include enhanced controls, additional training, policy updates, and disciplinary action.
3. Implementing Remedial Actions: Corrective measures are effectively communicated and integrated.
4. Monitoring and Follow-Up: Effectiveness of implemented measures is regularly reviewed and monitored.
5. Continuous Improvement: Lessons learned are used to strengthen compliance and mitigate future risks.
6. Communication and Transparency: Transparent communication is maintained throughout the resolution process.

7. Non-Retaliation Policy:

1. Prohibition of Retaliation: Retaliation against individuals who report concerns is strictly prohibited.
2. Awareness and Education: Regular training and educational initiatives are conducted.
3. Confidential Reporting Mechanisms: Multiple confidential reporting channels are provided.
4. Immediate Action Against Retaliation: Allegations of retaliation are promptly investigated and addressed.
5. Support and Assistance for Whistleblowers: Counselling services, legal advice, and other resources are provided.
6. Leadership Accountability: Leadership promotes and adheres to the non-retaliation policy.
7. Continuous Monitoring and Improvement: The policy and related processes are regularly monitored and improved.
8. External Reporting Options: External reporting to authorities is allowed without fear of retaliation.

8. Confidentiality:



Confidentiality is paramount in fostering trust and encouraging reporting of concerns.

1. Protection of Whistleblower Identities: Identities of whistleblowers are protected and disclosed only on a need-to-know basis.
2. Confidential Reporting Channels: Confidential channels are provided for reporting concerns.
3. Limited Disclosure of Information: Information is disclosed only to those involved in the investigation process.
4. Protection of Documentation: Documents and records are securely stored and accessible only to authorized personnel.
5. Non-Disclosure Agreements: Involved individuals may be required to sign NDAs.
6. Training on Confidentiality: Training on confidentiality obligations is provided.
7. Legal Compliance: Compliance with relevant confidentiality laws and regulations is ensured.
8. Continuous Monitoring and Improvement: Confidentiality practices are regularly reviewed and improved.

9. No Waiver of Rights:

R-Health acknowledges and respects legal rights under applicable whistleblower protection laws.

1. Protection of Legal Rights: The policy does not diminish or waive any legal rights.
2. Encouragement of External Reporting: External reporting is respected when necessary.
3. Non-Retaliation Assurance: Protection from retaliation for external reporting is provided.
4. Confidentiality Protections: Confidentiality safeguards are maintained regardless of reporting method.
5. Access to Legal Counsel: Support for accessing legal counsel is provided.
6. Training and Education: Regular training on rights and obligations is conducted.
7. Non-Waiver Clause: The policy includes a non-waiver clause to uphold legal rights.

10. Review and Updates:

The Whistleblower Policy is regularly reviewed and updated to ensure effectiveness and compliance.

1. Regular Assessments: Periodic assessments of the policy are conducted.
2. Compliance Monitoring: Compliance with relevant laws and standards is monitored.
3. Stakeholder Engagement: Feedback from stakeholders informs policy updates.
4. Training and Awareness: Employees are trained on policy updates.
5. Board Oversight: The Board of Directors oversees the review and update process.
6. Documentation and Recordkeeping: Documentation of all reviews and updates is maintained.
7. Communication of Changes: Updates are communicated transparently.
8. Periodic Review by Legal Counsel: Legal counsel reviews the policy to ensure compliance.

11. Conclusion:

R-Health is committed to fostering a culture of integrity, transparency, and accountability. We encourage all individuals associated with R-Health to speak up and report concerns if they believe that the company's values, laws, or policies are being violated. Your commitment to ethical behaviour and compliance is essential to our success.