

1 INTRODUCTION

The term *whistleblowing* is used to describe a disclosure by an employee or another person of suspected wrongdoing within an organisation. It is essential that reporting persons feel safe and protected and report their suspicions in early stages of the suspect activity.

Accolade supports its employees and other persons in reporting matters that are deemed to contravene the rules and values upheld by Accolade. By implementing its **Integrity Line**, Accolade makes available various reporting channels that ensure the protection of the reporting person's identity. Where the identity of the reporting person is known, it is never disclosed without the explicit consent of the reporting person. Similarly, no other information is disclosed that could be used to infer a reporting person's identity, unless required by law.

Timely reporting of suspected wrongdoings is beneficial as it facilitates the speedy investigation of the reported matter and reduces the chances of any negative impacts.

2 WHO CAN FILE A REPORT

Reports may be filed by natural persons who have become aware of an illegal activity in connection with their work or similar activity performed for Accolade. Reports may be also filed by business partners of Accolade such as tenants, purchasers, suppliers or agents

The report may be also filed anonymously. However, the knowledge of whistleblower's identity is preferred to collect as much information and materials related to the case as possible and perform high quality investigation.

3 WHAT SHOULD BE REPORTED

The Integrity Line can be used to report suspicions of in particular the following types of wrongdoing:

- (a) breaches of EU law,
- (b) criminal offence, including theft and fraud, or misdemeanour,
- (c) violations of Accolade principles and procedures,
- (d) bullying, harassment, discrimination or substance abuse,
- (e) violations of prevention of money laundering and terrorist financing,
- (f) violations of rules pertaining to the protection of privacy and personal data, and the security of network and information systems,
- (g) threats to health and safety of persons,
- (h) damage to the environment,
- (i) violations of other statutory obligations,
- (j) attempts to suppress or conceal information regarding any of the above.

There is no requirement for definitive supporting evidence to be included with the report. Disclosures

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need only be made in good faith given the circumstances at the time of the disclosure.

4 FILING A REPORT

It is recommended that all relevant suspicions be reported using the Integrity Line available to the reporting persons non-stop on the following link: <https://ethicshotline.eu/cs/?client=27851371>

The Integrity Line ensures high level of whistleblower protection as well as systematic investigation, and a timely response to a report in accordance with the local legislation.

The Integrity line is administered by an independent provider which has been authorised by Accolade. Additional information is available directly on the Integrity Line portal.

In addition, it might be also possible to directly contact competent persons specified in local country policies such as a compliance officer, Group Legal Counsel or similar. However, any communication channel and local procedure must be implemented in accordance with the principles expressed in this policy and local law.

5 PROTECTION OF REPORTING PERSONS

It is understandable that potential reporting persons may be apprehensive about reporting their suspicions and possible consequences befalling them. Accolade has developed this policy to implement a framework which ensures that Accolade employees and third parties are listened to and can share their justified suspicions of wrongdoing without a fear of retaliation.

Accolade ensures the protection of persons reporting their suspicions in good faith even if the suspicions subsequently prove to be unjustified. Reports made with the intention to provide knowingly false information and damage Accolade do not enjoy such protections and may be penalised in compliance with whistleblower protection legislation in relevant country.

Reporting persons may decide to file their reports anonymously. In that case, they should provide the maximum number of materials to support their complaint.

Where the reporting person shares their identity, Accolade will not disclose any personal information without the explicit consent of the reporting person to any person other than the competent persons authorised to investigate reports. The same applies to any other information from which the identity of reporting persons could be inferred (unless required by law, such as in connection with investigation by law enforcement authorities or as part of judicial proceedings).

6 PROTECTION OF PERSONS AFFECTED BY REPORT

Persons affected by the investigation of a report are entitled to fair treatment during the investigation. This includes the unbiased and objective assessment of relevant facts, the prohibition of discrimination and the protection of personal data as stipulated by applicable legal regulations.

7 INVESTIGATION AND NOTIFICATION

When reported both via the Integrity Line or to competent person, the reporting person will receive a receipt of the report and will be informed about the course of the investigation as well as the conclusion in accordance with the local legislation.

The competent persons authorised to investigate the report may use a system of confidential communication with the reporting person to obtain additional information as necessary and request

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a meeting with the reporting person as an opportunity for the latter to explain their suspicions in detail and provide any available evidence. The reporting person is not obliged to agree to such a meeting.

The competent persons authorised to investigate the report may also request cooperation from any person to whom the report is related or other Accolade employees who may assist in the investigation. Any information so obtained remains confidential.

Should a reporting person feel at any point during the investigation that they are the subject of retaliatory measures as a result of their report, they must notify Integrity Line provider of the fact at their earliest opportunity. Any such claim will be reviewed as part of the investigation and any person found to have participated in any retaliatory measures will be treated in compliance with applicable labour law provisions.

In case of a confirmed wrongdoing, Accolade shall introduce appropriate measures and take necessary steps to improve the internal compliance system. Neither the measures introduced, nor the information provided may encroach or jeopardise any interest protected by law, including objectives of criminal proceedings, misdemeanour proceedings or any other proceedings regarding an activity that bears the characteristics of a misdemeanour.

8 FINAL PROVISIONS

The COO and the Group Legal Counsel of Accolade shall ensure that regularly, not less than every two years, this policy is revisited and reevaluated in light of development of Accolade's business and applicable laws.

Violation of this policy or any confirmed misconduct may lead to disciplinary action ranging from a warning and termination of employment to a civil legal action and referral for regulatory or criminal prosecution.

This Policy was reviewed by the COO and the Group Legal Counsel of Accolade and approved by the Board of Directors of Accolade Holding, a.s. as the parent company of Accolade on 30 June 2025.