

Na osnovu člana 16. Zakona o zaštiti uzbunjivača („Zakon“), PPD Serbia d.o.o. Beograd (“Poslodavac”) ovim donosi sledeći

In accordance with Article 16 of the Whistleblower Protection Act (“Act”), PPD Serbia d.o.o. Beograd (“Employer”) hereby issues the following:

PRAVILNIK O POSTUPKU UNUTRAŠNJEG UZBUNJIVANJA

RULEBOOK ON INTERNAL WHISTLEBLOWING PROCEDURE

1. Uzbunjivanje je otkrivanje informacije o kršenju propisa, kršenju ljudskih prava, vršenju javnog ovlašćenja protivno svrsi zbog koje je povereno, opasnosti po život, javno zdravlje, bezbednost, životnu sredinu, kao i radi sprečavanja štete velikih razmera, a može da bude unutrašnje, spoljašnje ili uzbunjivanje javnosti.

1. Whistleblowing is revealing of information related to violation of regulations, violation of human rights, abuse of public authority, or endangerment of life, public health, safety and environment, as well as for the purpose of preventing the occurrence of substantial damage, and may be internal, external and to the general public.

2. Unutrašnje uzbunjivanje je otkrivanje informacije poslodavcu. Spoljašnje uzbunjivanje je otkrivanje informacije ovlašćenom organu vlasti. Prema Zakonu, javnost se može uzbuniti, bez prethodnog obaveštavanja Poslodavca ili ovlašćenog organa samo u slučaju neposredne opasnosti po život, javno zdravlje, bezbednost, životnu sredinu, od nastanka štete velikih razmera, odnosno ako postoji neposredna opasnost od uništenja dokaza.

2. Internal whistleblowing is revealing of information to the Employer. External whistleblowing is revealing of information to an official authority. Under the Act, whistleblowing to the general public may be done without first informing the Employer or an official authority only in case of imminent danger to life, public health, safety or environment, or of occurrence of substantial damage or of destruction of evidence.

3. Uzbunjivač ima pravo na zaštitu, u skladu sa zakonom, pod sledećim uslovima:

3. A whistleblower is entitled to protection under the Act, under the following conditions:

- ako izvrši uzbunjivanje u roku od jedne godine od dana saznanja za izvršenu radnju zbog koje vrši uzbunjivanje, a najkasnije u roku od deset godina od dana izvršenja te radnje; i
- ako je odnosna informacija takva da bi, u trenutku uzbunjivanja, na osnovu raspoloživih podataka, u istinitost informacije poverovalo lice sa prosečnim znanjem i iskustvom kao i uzbunjivač.

- the whistleblowing must occur within one year after the whistleblower found out about the relevant violation, but in any case not later than 10 years after the relevant violation took place; and
- the relevant information must be such that a person with average knowledge and with the same level of experience as the whistleblower would believe its authenticity at the moment of whistleblowing, based on available data.

4. Ukoliko je zaposlenom/oj poznato ili sumnja da je došlo do kršenja važećih zakona i drugih propisa ili nekog internog propisa Poslodavca,

4. If the employee is aware of or suspects a violation of applicable laws or regulations or of any Employer's internal policy, including the

uključujući Pravila ponašanja doneta na nivou PPD grupe društava (u važećoj verziji objavljenoj na intranet stranici Poslodavca na srpskom jeziku), zaposleni/a je dužan da to odmah prijavi na neki od sledećih načina:

- obaveštavanjem lica zaduženog za kontrolu primene propisa od strane zaposlenih na nivou PPD grupe društava, a koje lice je ovim od strane Poslodavca ovlašćeno za prijem informacije i vođenje postupka u vezi sa uzbunjivanjem ("**Ovlašćeno lice**"), putem elektronske pošte na e-mail adresu: Corporate.Compliance@ppdi.com; ili
- pozivanjem posebnog telefonskog broja za prijem osetljivih informacija na +1 770 613 6324 (pozivi na ovaj broj se upućuju nezavisnoj službi koja će sa svim informacijama da postupa na poverljiv način).

4. Uzbunjivač može da odluči da njegov/njen identitet ne bude otkriven, u kom slučaju će Ovlašćeno lice biti dužno da zaštititi identitet uzbunjivača. Ukoliko bude neophodno, na osnovu važećih zakona, da se otkrije identitet uzbunjivača državnim organima (npr. javnom tužiocu), Ovlašćeno lice će o tome unapred obavestiti uzbunjivača i takođe obavestiti uzbunjivača o merama zaštite koje mu stoje na raspolaganju u okviru krivičnog postupka. Svaka prijava kršenja propisa će biti čuvana u tajnosti u najvećoj mogućoj meri dozvoljenoj važećim zakonima.

5. Iako prijave kršenja propisa ili sumnje da je došlo do kršenja mogu da budu učinjene usmenim putem, ovim želimo da ohrabrimo zaposlene da takve prijave učine pisanim putem, kako bi što više pomogli postupak istrage.

6. Uzbunjivač može takođe i da izvrši prijavu na anoniman način, koristeći neku od gore navedenih metoda komunikacije. Međutim, u takvim slučajevima, Ovlašćeno lice obično neće

Code of Conduct applicable on PPD group level (published in the Serbian version on the Employer's intranet), the employee is obligated to promptly report this in any of the following ways:

- contacting the person responsible for HR compliance issues on the PPD group level, who is hereby also authorized by the Employer to receive and process whistleblowing information ("**Authorized Person**"), by sending an e-mail to Corporate.Compliance@ppdi.com; or
- Calling a special hotline at +1 770 613 6324 (the hotline is answered by an independent service that will treat all calls confidentially).

4. A whistleblower may choose that his/her identity is not revealed and the Authorized Person shall then protect the identity of the whistleblower. If it becomes necessary under the applicable laws to reveal the identity of the whistleblower to an official authority (e.g. to the public prosecutor), the Authorized Person shall inform the whistleblower about this fact beforehand, and also inform the whistleblower about the available protection measures in a criminal proceeding. Any reported violation will be kept confidential to the maximum extent allowed under applicable laws.

5. Although reports of violations or suspected violations may be made verbally, employees are encouraged to make any such reports in writing, to assist in the investigation process.

6. Whistleblowing reports may also be made anonymously, by using any of the methods set forth above. In these cases, however, it will usually not be possible for the Authorized

biti u mogućnosti da obavesti uzbunjivača o rezultatima istrage.

Person to inform the whistleblower about the results of the investigation.

7. Ovlašćeno lice će pokrenuti postupak unutrašnje istrage u roku od 15 dana od dana prijema informacije. Kada ovaj postupak bude okončan, Ovlašćeno lice će obavestiti uzbunjivača o rezultatima istrage, u roku od sledećih 15 dana. Uzbunjivač takođe ima pravo da zahteva da bude obavešten o radnjama preduzetim u postupku i pre njegovog okončanja, kao i da bude prisutan za vreme saslušanja i da izvrši uvid u spise predmeta.

7. The Authorized Person shall initiate the internal investigation procedure within 15 days after receipt of a whistleblowing report. Once this procedure is finalized, the Authorized Person shall inform the whistleblower about the results of the investigation, within the following 15 days. The whistleblower is also entitled to request to be informed about the actions taken even before the investigation process is finalized and also to be present during hearings and inspect the case files.

8. Poslodavac očekuje od svojih zaposlenih da u potpunosti sarađuju u bilo kojoj istrazi ili postupku u vezi sa bilo kakvim ponašanjem koje bi moglo da predstavlja kršenje važećih zakona i drugih propisa ili bilo kojih internih propisa Poslodavca, uključujući Pravila ponašanja doneta na nivou PPD grupe društava. Poslodavac neće na bilo koji način stavlјati u nepovolјan položaj lice koje u dobroј veri prijavi zabrinutost, dostavi informaciju ili na drugi način pomogne u istrazi ili drugom postupku.

8. The Employer expects all employees to cooperate fully with any investigation or proceeding regarding any conduct that may be a violation of applicable laws or regulations, or any internal Employer's policies, including the Code of Conduct applicable on PPD group level. The Employer will not retaliate in any way against a person who acts in good faith to report a concern, provide information or otherwise assist in an investigation or proceeding.

9. U slučaju da uzbunjivač pretrpi neku štetu u vezi sa uzbunjivanjem, ima pravo na punu naknadu štete. Pored toga, uzbunjivač koji je bio izložen štetnim radnjama usled uzbunjivanja, može i da podnese tužbu za zaštitu u vezi sa uzbunjivanjem nadležnom sudu, u roku od šest meseci od dana saznanja za preduzetu štetnu radnju, ali najkasnije u roku od tri godine od dana kada je štetna radnja preduzeta.

9. In the event that the whistleblower should suffer any damages due to his/her whistleblowing actions, he/she is entitled to full compensation. In addition to this, the whistleblower who was exposed to damaging actions due to his/her whistleblowing may also file a lawsuit and seek protection, within six months after founding out about the respective actions taken against him/her, but in any case not later than three years after the respective actions were taken.

10. Zabranjena je zloupotreba uzbunjivanja na neki od sledećih načina:

10. It is prohibited to abuse whistleblowing in the following ways:

- prijavljivanje informacije za koju je to lice znalo da nije istinita; ili

- to file a whistleblowing report knowing that the revealed information is not true; or

- ako lice pored zahteva za postupanje u vezi sa informacijom kojom se vrši uzbunjivanje traži protivpravnu korist.
- to file a whistleblowing report and request illegal gains.

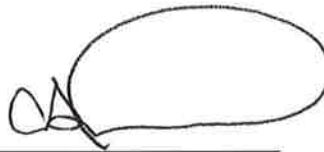
12. Na sve što nije regulisano ovim Pravilnikom, neposredno se primenjuju Pravila ponašanja, čiji je tekst u važećoj verziji dostupan svim zaposlenima na internoj mreži (*intranet*) Poslodavca. U slučaju bilo kakvih neusaglašenosti između Pravila ponašanja i ovog Pravilnika, primenjivaće se odnosne odredbe ovog Pravilnika kao merodavne.

12. In case of issues which are not mentioned in this Rulebook, the relevant provisions of the Code of Conduct shall apply directly, with the applicable version of the Code of Conduct available to all employees on the Employer's intranet. In case of any discrepancies between the Code of Conduct and this Rulebook, the relevant provisions of this Rulebook shall take precedence.

13. Ovaj Pravilnik je sačinjen je na srpskom i engleskom jeziku, pri čemu samo tekst na srpskom jeziku ima pravno dejstvo.

13. This Rulebook was made in the Serbian and English language, of which the Serbian version shall govern.

Za Poslodavca / For the Employer:



Christopher David Neild
Direktor / Managing Director

