



Teva's Integrity Hotline Complaints Procedure

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The Office of Business Integrity (OBI) manages Teva's Integrity Hotline complaints procedure, from initial intake and assessment through investigation and resolution. The OBI is a confidential and trusted resource dedicated to supporting Teva's values and promoting a speak-up culture.

Who can report a concern and where should the concern be reported?

Anyone with concerns regarding potential violations of [Teva's Code of Conduct](#) (Teva's Code), policies or laws can report it to the OBI through [Teva's Integrity Hotline](#), a globally accessible site.

Employees are also encouraged to report concerns to their manager or to a local Human Resources, Compliance & Ethics, Internal Audit or Legal representative. If any Teva personnel receives a report alleging potential violations of law, anti-corruption, anti-bribery, fraud or other financial misconduct, they must promptly provide the details to the OBI for investigation.

What types of complaints can be reported?

Teva's Integrity Hotline is a confidential channel for anyone to ask questions and/or report concerns about actual or suspected violations of Teva's Code, policies or laws. Examples include environmental and human rights issues, harassment, improper handling of company assets, violations of antitrust laws, corruption and bribery and unethical marketing practices, as well as data and information protection.

Reporters will not be penalized for making a report in good faith, even if it is later determined that a violation has not occurred.

How are complaints handled?

Teva's Integrity Hotline provides reporters the option to submit concerns via country-specific toll-free telephone numbers or an [online web-form](#).

If a concern is reported via telephone, a hotline representative will guide the reporter through the reporting process in the local language. Calls are not recorded and anonymity is maintained at the caller's request and as permitted by local laws and regulations.

If a concern is reported via the online web-form, the reporter will be prompted to specify the country from which they are reporting to ensure the online web-form can be configured to reflect data privacy restrictions applicable in each country.

Regardless of how a concern is reported, an electronic summary of all reports is created and maintained in a secure case management system managed by the OBI—an independent group comprised of investigators who are impartial. OBI investigators review complaints in an objective, confidential and consistent manner. The OBI handles each complaint with a consistent approach:

i) Receipt of the report

Reporters will receive a unique report key and password, which can be used to access previously submitted reports, provide additional information or communicate confidentially with the OBI. Reporters will receive a receipt of acknowledgement from the OBI within 48 hours, but no later than seven days.

ii) Assessment of the concerns

The OBI will review the report to determine whether an investigation is appropriate and what further actions are needed, while maintaining confidentiality and objectivity throughout the process. If the report does not provide sufficient information to review, the OBI will ask the reporter for more details. The OBI may consult various subject matter experts to understand risks and implications related to concerns reported.

iii) Investigation of the concerns

If an investigation is warranted, the OBI will assign an independent and objective investigator to review the concerns. Investigations are conducted according to local laws and regulations, including privacy.

iv) Reporting of findings for management and remediation

Fact-based observations and findings are shared with relevant management and Human Resources representatives for remediation and on a business need-to-know basis. When determining corrective actions, management consults with the OBI to ensure calibration and consistency.

v) Closure of the case

Upon the completion of the investigation, the OBI will notify the reporter that the matter is closed. The OBI is committed to efficiently reviewing and resolving matters and strives to resolve the majority of matters within 30 to 60 days. As each investigation is different, the length of time needed to resolve matters varies. Reporters are encouraged to [follow up](#) on their reports regularly. When appropriate and possible, the OBI will provide reporters periodic updates in compliance with local legal requirements.

How are reporters protected from retaliation?

In order to protect reporters and employees, Teva maintains a zero-tolerance policy for retaliation. Any form of retaliation against anyone for making a good faith report, even if the concerns are ultimately unfounded, will not be tolerated.

Any act or threat of retaliation will be considered a violation of Teva's Code, and Teva will monitor and address allegations and threats of retaliation with high priority.

Teva maintains confidentiality and reviews only the necessary information to conduct the investigation in compliance with local legal requirements. Teva implements measures to ensure the information needed to conduct an investigation is shared on a strict business need-to-know basis.

Can reporters remain anonymous?

In countries where permitted, reporters have the option to remain anonymous. Additionally, reporters can communicate confidentially with the OBI by using their unique report keys and passwords, which can also be used to access reports previously submitted to Teva's Integrity Hotline.

Is Teva's complaints procedure reviewed for effectiveness?

As part of Teva's Global Compliance & Ethics Program, the effectiveness of Teva's Integrity Hotline complaints procedure is subject to periodic external review. Teva considers feedback from employees, management and others (e.g., during trainings, presentations and investigations). Additionally, Teva's Integrity Hotline telephone numbers are tested bi-annually to ensure they are operating effectively.