Swiss TPH Tell-Us System Policy

EQS Integrity Line

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Associated Institute of the University of Basel

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1. GENERAL PROVISIONS

1.1 Purpose

Excellence in governance is a high priority for Swiss TPH. The Institute does not tolerate any misconduct or malpractice and hence aims to remedy conditions that violate legal and moral-ethical provisions. For this reason, and in accordance with our guiding principles, Swiss TPH has implemented a Tell-Us System with which employees, students and third parties can report grievances, abuses, harassments, fraud or other kind of misconduct and malpractice.

This document defines the policy for using the EQS Integrity Line reporting platform (the “Tell-Us System” or “the Platform”) of Swiss TPH. The Tell-Us System is part of the Governance, Risk and Compliance program of the Institute. Its principal goals are to reinforce the safety, the security and the respect of the physical and psychological integrity of Swiss TPH employees, as well as to safeguard the interests of the institution.

1.2 Description

The Tell-Us System is a digital reporting system accessible worldwide 24/7 via an internet webpage, which is run over a platform provided by EQS Group (www.eqs.com). The Platform offers the possibility to report incidents, anonymously or non-anonymously, while ensuring the security and the confidentiality of the reporting person. The objectives pursued by developing an independent reporting mechanism are to:

- prevent frauds and misconducts ;
- achieve and maintain work standards that comply with all ethical and legal requirements ;
- identify security breaches within the Institute ;
- increase the transparency within the Institute ; and
- improve the quality of our work.

1.3 Scope

This Tell-Us System policy applies to all users granted "Case Manager” or "Administrator and Content Manager” access to the Platform, as well as to the “End Reporting Manager” and “Reporting Persons.”

Six topic areas are covered in the Tell-Us System. These reporting streams are handled independently by a dedicated Case Manager and are accessible via the Incident Reporting function of the Tell-Us System front page:

- **Human Resources related matters**
  Sexual and any other kind of harassment (verbal or written denigration, improper physical, verbal or non-verbal behaviour), workplace bullying as well as discrimination based on age, disability, marital status, nationality, ethnicity, skin colour, religion, gender, sexual orientation or gender identity can be reported via this reporting stream.

- **Financial related matters**
  Internal fraud (corruption, conflict of interest, bribery, asset misappropriation of cash or of assets, financial statement fraud) as well as external fraud (involving external third parties) can be reported via this reporting stream. This also includes irregularities, collusion or manipulation of procurement processes.

- **Health, Safety, Security & Environment**
  Report information, concerns or violations of applicable laws and regulations relating to occupational safety, security, health and environmental protection at Swiss TPH.

- **Research Ethics & Scientific Integrity**
  Any information, concern or suspicion of violation of "Research Ethics" (unethical procedures, mainly in research involving human beings) or of "Scientific Integrity" (good scientific practices, as defined in the Code of Conduct and the Integrity Regulations of the University of Basel) relating to Swiss TPH research can be reported via this reporting stream.

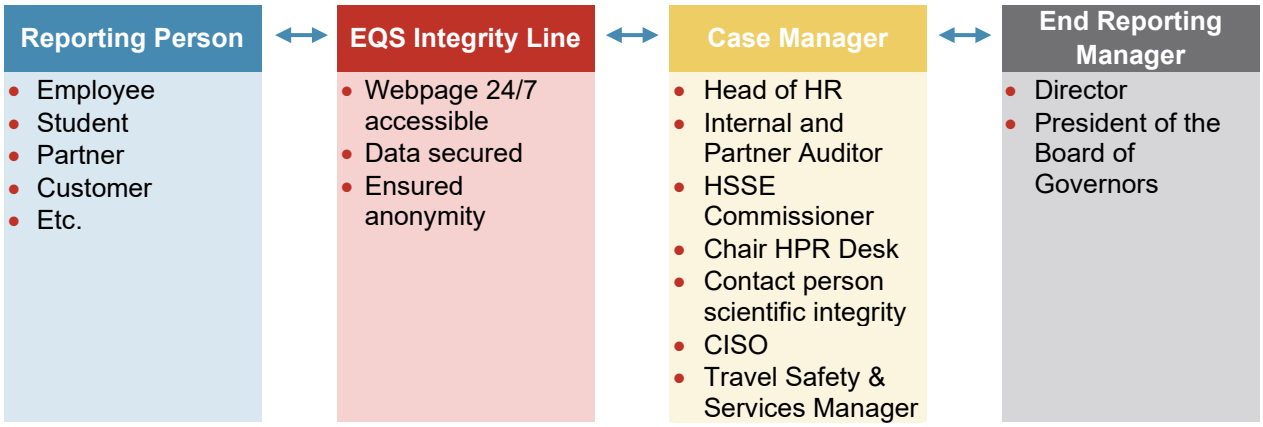
- **Information Security & Data Protection**
  Report information, concerns or suspicions of Information Security or Data Protection breaches relating to Swiss TPH.

- **Travel Safety & Security**
  Report information, concerns or suspicions of breaches of the Swiss TPH Travel Safety and Security regulations and guidelines.

Note: The detailed case reporting flow is available in the Appendix B of the document.

1.4 General reporting process

The general reporting process between the Reporting Person, the Platform and Swiss TPH is as follows:



1.5 User role and definition

The Platform comprises four user levels that are defined as follows:

Reporting Person

Any person who would like to report an incident to the management of Swiss TPH, either anonymously or not (See 4.3 Right to Anonymity). Internal parties (employees and students) as well as external parties (suppliers, customers, partners, etc.) can directly access the front-end webpage of the Platform directly through their web browser:

https://swisstph.integrityline.io/

Case Managers

Person in charge of handling the reports submitted by the Reporting Persons. They have access to the cases through the back-end webpage of the Platform:

https://www.compliancecockpit.io/login

Case Managers receive automatic and immediate access to cases relating to their dedicated reporting stream. Due to the potential sensitivity and the confidentiality of the information reported,

the Case Managers can only have access to the reports that concern the topic they are responsible for. (See 1.3 Scope).

The Case Managers can directly dialogue with the Reporting Persons through the Platform. They collaborate with the other Case Managers while ensuring to keep strict confidentiality about the information they are handling. At least once a year, the Case Managers report on the incidents they are treating to the End Reporting Manager.

Administrator and Content Manager

The Administrator and Content Manager is the person responsible for the maintenance of the Platform and is the key contact person with the EQS Group. He/she also provides support to the Case Managers if necessary. Moreover, he/she has the following additional rights:

- create and deactivate users' rights ;
- assign case access rights if not automatically assigned through a specific tree exit ;
- view users audit trail ; and
- adjustment of the platform texts and questionnaires as well as the reporting process and categories.

Two persons must always have the role of Administrator and Content Manager to ensure a service continuity and a mutual control over the function.

The Administrator and Content Manager has also the responsibility to start handling the case with the End Reporting Manager and to answer to the Reporting Person within ten (10) working days if a Case Manager is not able to assume his/her function.

End Reporting Manager

This person is ultimately in charge of the reporting stream. He or she receives cases and annual reports from the Case Managers. He or she provides support and advice to the Case Managers when needed, decides on corrective measures and/or sanctions if necessary, and ensures the correct communication and application of the measures retained.

1.6 Languages

The front-end page of the platform is accessible in three different languages: English, German and French. The answer to the Reporting Person should be given in the same language as the one that has been used to report the case. However, if this is not possible or not adapted, an answer in English is also allowed.

2. REGULATION ON THE USE OF THE EQS INTEGRITY LINE REPORTING PLATFORM OF SWISS TPH

The highest ethical standards and a strong personal integrity are required when using the Platform or any information obtained through it. A careful attention should be brought to the Manual for Employees of Swiss TPH, and a particular reference is made to the following documents:

- Code of Conduct ;
- Terms of use of the intranet, internet and email ; and
- Regulation on the handling of data.

Moreover, a special emphasis is drawn on the following aspects:

2.1 Obligations for the Case Managers

2.1.1 Intend purpose only

The Platform of Swiss TPH can only be used for professional reasons and with the final goal of protecting the Swiss TPH and its employees. All misuse of the Platform or use of information obtained through it for personal interest will be subject to sanctions (See 5. Sanction in case of misuse).

2.1.2 Duty of confidentiality

The Case Managers commit not to disclose any information that they obtained through the Platform. This provision also remains valid beyond the duration of their role as Case Manager and their employment relationship with Swiss TPH.

Any breaches to this duty could potentially:

- contravene to the right to the protection of personal privacy of the Swiss TPH employees according to article 328 of the Swiss Code of Obligations (OR) ;
- jeopardize the psychological or the physical integrity of the Reporting Person ; and
- lead to financial or reputational damages for the Institute.

2.1.3 Duty of protection of the Reporting Persons

The Case Managers contribute to the protection of the personality and the protection from discrimination and harassment of the Reporting Persons in accordance with the Code of Conduct of Swiss TPH.

Depending on the specific situation experienced by the Reporting Person and the dangers incurred, the Case Manager should indicate to the Reporting Person which bodies can be contacted, internally (HR, persons of trust, etc.) or externally (police, psychological support service, etc.).

Moreover, if the psychological or physical integrity of the Reporting Person is at risk, the Case Manager must immediately inform the Crisis Management Team (CMT) Leader (Director of Swiss TPH) and the CMT Coordinator (HSSE Commissioner or Travel Safety & Services Manager), who may activate the CMT. The CMT is then responsible for implementing all necessary measures to safeguard the psychological and physical integrity of the Reporting Person.

For more information on incident, emergency and crisis management, please refer to the security, safety and health intranet webpage.

2.1.4 Absence of conflict of interest

The Case Managers must actively avoid any conflict of interest.

If a Case Manager faces a situation where he or she could have a conflict of interest, he or she must immediately disclose it and contact the Administrator and Content Manager that will, in agreement with the End Reporting Manager, forward the incident to another competent Case Manager.

2.1.5 Additional obligations for the Administrator and Content Managers

The Administrator and Content Manager user right can only be used for the functions defined in the paragraph 1.5 User role and definition, Administrator and Content Manager. All misuse of the

platform or use of information obtained through it for personal interest will be subject to sanctions (See 5. Sanction in case of misuse).

2.2 Information Security

2.2.1 Data protection & information security

According to the contract and the "Data Processing Exhibit for EQS Cloud Services", the EQS Group is responsible for ensuring the security of the Platform and of the data that transit through it. They are especially required to respect the following commitments:

- all data is stored in a certified, high-security ISO 27001-certfied data centre located in Switzerland ;
- ensure a secure platform certified ISO 27001 and subject to regular penetration tests by independent third parties ; and
- all report data is stored highly encrypted and only the Case Managers have access to the decrypted data using their personal login information.

2.2.2 Logging and Access to the Platform

Case Managers can access the back-end webpage of the Platform via an individual username and password. Case Managers must not share their usernames and passwords or grant access to the Platform to other employees or third parties.

2.3 Compliance with laws and regulations

According to the contract and the "Data Processing Exhibit for EQS Cloud Services", the EQS Group is responsible for ensuring the compliance of the Platform with national and international laws and regulations.

"3.8. EQS Group regularly monitors internal processes and technical and organizational measures to ensure that processing in its area of responsibility is carried out in accordance with the requirements of applicable data protection legislation and that the rights of the data subject are protected."

They are especially committed to ensuring that the Platform complies with the following regulations:

- General Data Protection Regulation of the EU (GDPR) ; and
- Swiss Data Protection Act.

3. CASE MANAGER GUIDELINES

3.1 Reporting process

The detailed reporting process is available under Appendix A: Case management process.

3.2 Grant of the User's right

Only the Director of Swiss TPH can grant the user roles of Case Manager and Administrator and Content Manager. Then, the Administrator and Content Manager manage the user roles in the Platform.

3.3 Processing times

When submitting a report, the Reporting Person receives an automatic acknowledgment of receipt from the EQS Platform.

The Case Manager must give a first answer to the report within ten (10) working days after receiving it. *Note: For the Information Security and Data Protection reporting stream, the reporting to authorities (e.g. in case of data breaches) should happen within 72 hours*.

The Reporting Person must be informed of the status of the internal investigation, its outcome, and any action taken within three (3) months.

3.4 Incident severity

An indicative table of incident severity is provided below. Fulfilling one of the three criteria (human, reputational or financial damages) is sufficient to reach the relevant severity threshold. Please note that this table is provided for informational purposes only. Ultimately, the professional judgment of the Case Manager is key to evaluating the severity of a reported incident.

Level of Severity	Human	Reputational	Financial
Low	The psychological or physical integrity of the Reporting Person is not endangered	No reputational damage is identified for the Institute	< CHF 100'000
Medium	The psychological or physical integrity of the Reporting Person is potentially endangered	A potential reputational damage is identified for the Institute	> CHF 100'000 and < CHF 500'000
High	The psychological or physical integrity of the Reporting Person is certainly endangered	Severe or significant reputational damage is identified for the Institute	> CHF 500'000

Medium and High-severity incidents require an immediate action from the Case Manager:

- immediate information of the End Reporting Manager ;
- safeguard measures for the Reporting Person and/or the Institution ;
- obligation to open an investigation.

In case of doubt concerning the severity of the incident, the Administrator and Content Managers and the End Reporting Manager can be consulted. Additionally, the Swiss TPH Risk Matrix can be referenced for further guidance.

3.5 Case Investigation

Medium and High-severity incidents always require an investigation. The investigation of a Low-severity incident is at the decision of the Case Manager, based on his or her professional judgement.

Any decision not to investigate must be justified, and all such cases must be listed and presented once a year in the annual report to the respective End Reporting Manager.

Investigations must follow the specific methodology of the concerned Case Manager Service / Unit.

3.6 Reporting

Case Reporting

Each incident must lead to a written report by the Case Manager:

- justifying the decision not to investigate, given the elements collected by the Case Manager ; or
- describing the investigation performed, the conclusion, and the recommendation of corrective measures, if necessary.

Reports are to be written according to the specific methodology of the concerned Case Manager Service / Unit.

Once finalized, the reports must be submitted to the End Reporting Manager responsible for the relevant reporting stream. If the End Reporting Manager is involved in the case, the report should be submitted to the alternative reporting entity after discussion with the Administrator and Content Managers.

Note: The Case Managers have also the possibility to create a case on the Platform to process an incident that has been reported outside the Platform (Mail, phone, etc.) and / or to track their annual case statistics.

Annual Case Manager Reporting

The Case Manager prepares an overview of all cases treated during the year, including those that have not been investigated. The timing of this annual reporting must be determined in agreement with the responsible End Reporting Manager.

3.7 Implementation of measures

A systematic evaluation of each case must be performed in order to draw lessons and avoid such incidents from happening again. This evaluation should include cause analysis, likelihood of occurrence, and analysis of eventual internal control deficiencies.

The Case Manager is primarily responsible for suggesting cause-related recommendations to the End Reporting Manager.

The End Reporting Manager is then responsible for deciding which recommendations to retain and/or submit to further organizational structures at Swiss TPH, such as the Executive Team or the Board of Governors, if necessary. The End Reporting Manager is also responsible for ensuring that the retained recommendations are turned into applied and communicated measures.

If misconduct of the End Reporting Manager is reported, the Case Manager must contact the Administrator and Content Managers so that the case can be coordinated with the President of the Board of Governors, who acts as an alternative End Reporting Manager.

3.8 Communication

The Case Manager is responsible for informing the Reporting Person about the status of the internal investigation, its outcome, and any actions taken.

The End Reporting Manager is responsible for ensuring that the defined actions and eventual corrective measures are properly communicated, as a first step to preventing this kind of incident from happening again.

3.9 Support

Support for Case Managers can be provided in the following ways:

- the EQS Support Center, which is available on the Platform ;
- consultation with the Administrator and Content Managers.

4. RIGHTS OF THE REPORTING PERSONS

Employees who discover an abuse should try to address and clarify this primarily through the direct hierarchy. If it is not possible to resolve the abuse in such a way or if they prefer to remain anonymous, employees should report this to the Tell-Us System.

Furthermore, the Swiss TPH has set up persons of trust who offer employees of the Swiss TPH confidential support in self-help and, if necessary, help them to find other contact persons or points of contact. The aim is to support those affected so that they can cope with the situations they experience as stressful or harassing on their own or with the help of the relevant contact points. The information and contact details of the persons of trust can be found on the intranet in the Human Resources section Persons of trust at Swiss TPH.

If it is not possible to eradicate the abuse in one of these ways, employees are entitled to report abuses to the cantonal ombudsperson (https://www.baselland.ch/politik-und-behorden/besondere-behoerden/ombudsstelle). The removal of the abuse must be in the public interest and must not serve to gain personal advantage. Only reports made in good faith are permissible, i.e. employees making the report may assume from an objective point of view that a violation actually exists. Permitted reports do not violate the duty of confidentiality pursuant to Art. 2.1.2 of these provisions.

4.1 Assurance of no disadvantages

Employees must not be disadvantaged in the employment relationship on the basis of permissible reports. Disadvantages include, dismissal, disregard in terms of the career hierarchy, and all other career-related obstacles, as well as deliberate psychological derogations and their tolerance. Anyone affected by such disadvantages due to a permissible report may appeal to higher authorities.

4.2 Respect of the data privacy

As mentioned in the paragraph 2.2.1 Data protection & information security, the EQS Group is responsible for ensuring the security of the Platform and of the data that transit through it.

They will particularly ensure the confidentiality, availability and the integrity of the data.

Furthermore, in accordance with the IT regulation “Terms of use of the intranet, internet and email”, users may request that Swiss TPH discloses whether any of their data is being processed at any time.

Personal data may not be disclosed to unauthorised third parties without the consent of the person(s) concerned or other reasonable justification. With respect to data confidentiality, the colleagues of the person concerned are deemed third parties.

4.3 Right to Anonymity

The Reporting Person can choose to remain anonymous throughout the entire process, from the report submission to the closing of the case. The EQS Integrity Line system ensures anonymity by enabling the Reporting Person to communicate with the Case Manager without revealing their identity.

The Reporting Person can decide to reveal his or her identity to the Case Manager, but the Case Manager cannot communicate this further, to the End Reporting Manager for instance, without prior consent of the Reporting Person.

4.4 Right of Information

The Reporting Person has the right to be kept informed about the case and any decisions that have been made:

- the Reporting Person receives a first answer from the Case Manager within ten (10) days after reception of the Report ; and
- the Reporting Person must also be informed of the status of the internal investigation and its outcome, as well as any action taken, within three (3) months.

4.5 Right of Withdrawal

At any time, the Reporting Person can withdraw his or her report by informing the respective Case Manager through the Platform. However, the Case Manager will always investigate the incident to ensure that the withdrawal is not the result of external pressure being exerted on the Reporting Person.

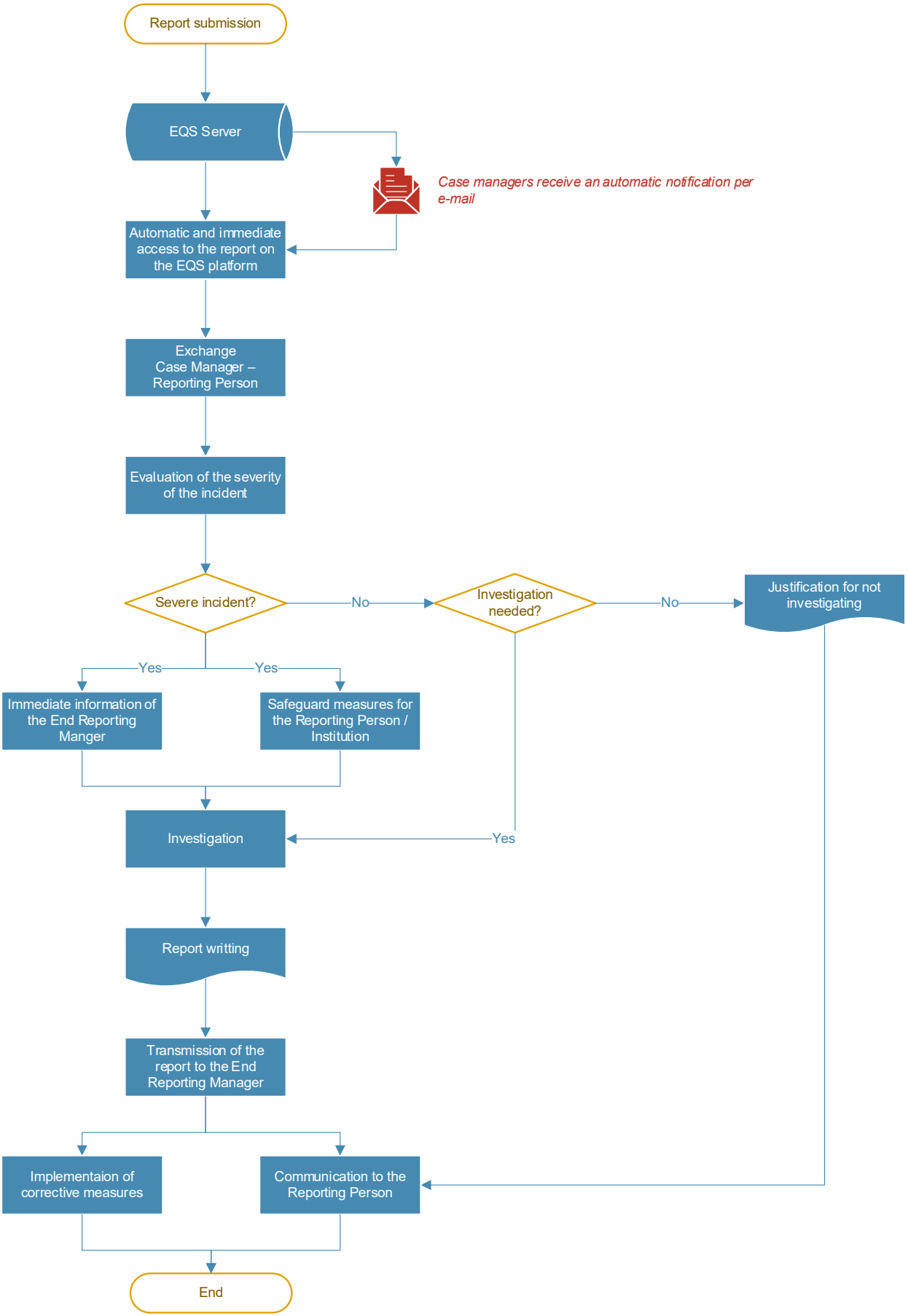
5. SANCTION IN CASE OF MISUSE

Swiss TPH may issue sanctions under labour law, such as admonition, a warning or termination (possibly without notice), against any user found to be misusing the Tell-Us System or of any confidential information obtained through it.

The Director is responsible for issuing sanctions.

Swiss TPH reserves the right to take further legal action against individuals who violate regulatory provisions or legal requirements.

Appendix A: Case management process



Appendix B: Case reporting flow

Reporting Stream	Case Manager	End Reporting Manager	Alternative Reporting Entity
Human Resources related matters	Head of HR	Director*	Cantonal Ombudsman
Financial related matters	Internal and Partner Auditor	Director*	Cantonal Ombudsman
Health, Safety, Security & Environment	HSSE Commissioner	Director*	Competent cantonal or federal authority
Research Ethics & Scientific Integrity	Chair HPR Desk	Director*	Ethikkommission Nordwest- und Zentralschweiz / EKNZ
	Contact person scientific integrity	Director*	Integrity Ombudsperson University of Basel
Information Security & Data Protection	CISO/DPO	Director*	Cantonal or federal independent data protection authority
Travel Safety & Security	Travel Safety & Services Manager	Director*	Competent cantonal or federal authority

*If misconduct of the End Reporting Manager is reported, the Case Manager must contact the Administrator and Content Managers so that the case can be coordinated with the President of the Board of Governors, who acts as an alternative End Reporting Manager.