



**NORTHERN1**  
INTERNATIONAL  
INSURANCE BROKERS

# WHISTLEBLOWER PROTECTION POLICY

Valid from April 1, 2026

## 1. OBJECTIVE OF THE DOCUMENT

Cavitas dental insurance broker OÜ (hereinafter referred to as the "company") emphasizes the importance of employees and other associated individuals reporting any potential violations of the Insurance Activities Act, misconduct, or inappropriate situations without fear of adverse repercussions.

This procedure outlines the primary rights and protections afforded to whistleblowers. Additional information may be obtained by reaching out to the individual responsible for compliance or legal affairs.

The objective of the procedure is to guarantee adherence to legal and regulatory standards, avert violations, and foster a transparent and ethical organizational culture.

This document outlines the procedures that an individual should adhere to if they intend to file a report regarding a breach of the stipulations outlined in the Insurance Activities Act; and the procedure that the company follows upon receiving a report of a breach.

## 2. DEFINITIONS

2.1 A violation constitutes an action or omission that is illegal or inconsistent with the objectives of the legal provisions outlined in the Insurance Activities Act.

2.2 A whistleblower is an individual who reports a violation that has come to their attention through work-related activities and who possesses reasonable grounds to believe that the violation has been initiated or completed.

2.3 The reporting methods include (a) an internal reporting channel (refer to section 5), (b) an external reporting channel, or (c) public disclosure in accordance with the stipulations outlined in the Whistleblower Protection Act concerning Violations of European Union Law in Employment.

2.4 The designated individual is a natural person officially appointed by the company's board, Signe Soonberg, who oversees the internal reporting channel, receives and records reports of violations, engages with the reporter, coordinates the initial assessment of the violation and the initiation of subsequent measures, and guarantees the confidentiality of the notification in accordance with the stipulations of the Whistleblower Protection Act.

2.5 The competent authority is the Financial Supervision Authority, which possesses supervisory or procedural jurisdiction over the infraction.

## 3. TO WHOM THE PROCEDURE IS APPLICABLE

3.1 The procedure is applicable:

- An individual engaged under an employment contract or another agreement governed by the law of obligations.
- An individual engaged in pre-contractual negotiations or otherwise preparing a contract, or an individual whose employment relationship has concluded.
- Member of the executive board
- An individual serving as a volunteer intern
- Individual employed by a contractual partner



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#### **4. REPORTABLE ITEMS**

4.1 Any possible infringement of the stipulations outlined in the Insurance Activities Act may be reported, including:

- breaches of laws and regulations
- fraudulence and corruption
- financial infractions
- data protection breaches
- customer mistreatment

4.2 If a report of misconduct is predicated solely on a personal complaint of a work-related nature, the whistleblower protection procedure is not applicable.

#### **5. COMMUNICATION CHANNELS**

5.1 The internal reporting channels are:

written notification to the email address [teavitaja@cavitas.eu](mailto:teavitaja@cavitas.eu)

- written notification to the address Narva mnt 5, 10117 Tallinn
- verbal notification via telephone +372 58949234
- verbal notification through the Teams platform

5.2 Communication channels guarantee:

- confidential disclosure
- reporting autonomously and free from conflicts of interest
- whistleblower safeguards
- facilitate feedback

5.3 The whistleblower may opt for an external reporting channel without prior utilization of an internal channel.

5.4 Within the professional realm of an insurance broker, the primary external channel is the Financial Supervision Authority, which can be contacted via phone, email, or online form; however, this is not a channel for consumer complaints.

#### **6. OBLIGATION OF CONFIDENTIALITY**

6.1 Regardless of the reporting channel, the recipient of the breach report (the designated individual in section 2.4) must guarantee the confidentiality of both the report itself and the identity of the reporter, which may only be disclosed with the reporter's written consent.

6.2 It must be established within the organization that only a designated individual or unit has access to the notification channel and information collection; this principle also extends to external channels.

6.3 Should the matter escalate to criminal proceedings, the regulations governing such proceedings will govern the maintenance of confidentiality; in this instance, the company is prohibited from disclosing the identity "on its own initiative."

#### **7. WHISTLEBLOWER PROTECTION**

7.1 The whistleblower is safeguarded against any form of retaliation, including:

- dismissal
- discrimination
- threat
- deterioration of employment conditions



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## **8. NOTIFICATION RECEIPT PROCEDURE AND DEADLINES**

The subsequent procedural framework outlines the internal organizational structure for receiving, investigating, and addressing a report.

### **STEP 1: REPORT SUBMISSION**

- The whistleblower is required to report the violation utilizing the notification form included in Annex 1.

### **STEP 2: RECEPTION AND REGISTRATION**

- The recipient of notifications (the designated individual in section 2.4) receives the notification, assigns a case number, and records the time of receipt. Access to the notification and associated information is restricted to the designated individual. Both the notification and the act of notification are confidential; the identity of the notifier may be disclosed only with written consent.

### **STEP 3: CONFIRMATION OF NOTIFICATION RECEIPT**

- The designated individual shall confirm receipt of the notification to the reporting party within 7 days of receiving the notification, unless the reporting individual has explicitly prohibited the acknowledgment or there is reason to believe that doing so would jeopardize the confidentiality of the reporting individual.

### **STEP 5: COMPETENCY AND SCOPE ASSESSMENT**

- The appointed individual will evaluate the extent of the submitted report and determine whether the company possesses the capability to manage it or if it must be referred to the appropriate authority.

If the company lacks the capability to process the report, the designated individual shall promptly forward the report to the appropriate authority, ensuring this is completed no later than the fifth working day following its receipt. Simultaneously, the individual reporting the breach shall be informed, unless they have explicitly requested that confirmation not be sent, or there is reason to believe that doing so would jeopardize the confidentiality of the reporting individual.

- If the notification pertains to the recipient of notifications (the designated individual in section 2.4), a member of the company's board of directors, or another key figure within the organization, the company will appoint a substitute responsible party or an external third party to guarantee independence and a process devoid of conflicts of interest.

### **STEP 6: DEVELOPING A RESEARCH PLAN**

- The appointed individual will develop an investigation plan, gather documents and logs, conduct interviews as needed, and the information contained in the received report will be utilized solely for the implementation of follow-up measures.

### **STEP 7: FOLLOW-UP MEASURES**

- The company will implement suitable measures to identify, eliminate, and prevent the violation or refer it to the appropriate authority for processing.



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#### STEP 8: EVALUATION

- The whistleblower will receive feedback on the implementation of follow-up measures at the earliest opportunity, but no later than three months, or in justified cases, six months after the receipt of the breach report, particularly if the breach was reported through an external reporting channel.
- Feedback will not be provided if the informant declines to submit feedback or if there is reason to believe that doing so would compromise the informant's confidentiality.

#### STEP 9: CLOSING OF CASE AND DOCUMENTATION

- The appointed individual will draft the termination decision, corrective action plan, and, if required, disciplinary measures, ensuring that all documents pertaining to the termination are retained for a minimum of three years.

### **9. PROHIBITION OF NOTIFICATION OBSTRUCTION**

9.1 The Company acknowledges that hindering the reporting of a violation is forbidden and may lead to legal repercussions.



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## ANNEX 1 – VIOLATION REPORT FORM

### 1. Reporter information (optional):

- Name:
- Contact (email address/telephone):
- Preference:  I desire anonymity  
 I allow to be contacted

### 2. Description of the infraction:

- What transpired / what is the suspicion?
- When?
- In which department, process, or system?
- Who is involved (individuals/roles; if unknown, then “unknown”)?

### 3. What is the significance of this?

- Potential legal infringement:
- Effect on the client/company/regulatory body:

### 4. Documentation and appendices:

- Documents, emails, screenshots, and logs (description):
- Attachment(s):  yes  no

### 5. Has the person related to the violation also been notified of the violation?

- no
- yes
- uncertain

### 6. Is there an imminent threat (e.g., ongoing data breach)?

- no
- yes – please specify the urgent risk:

### 7. Does the whistleblower want feedback on the implementation of follow-up measures?

- no
- yes – please specify how: