

## **Whistleblower Policy**

The Company is committed to the highest level of ethical practices and honest relationships and to ensuring that its business relations and day-to-day work are conducted with integrity. It is important that all employees and contractual stakeholders understand, support, and adhere to the values which are outlined in our ethical, social, environmental, and human rights policies. The engagements in these policies are the foundation of responsible business and upholding them is a priority for the Company.

As an important part of our commitment to upholding these values, the Company encourages employees and contractual stakeholders to speak up if they see behavior or activity that they reasonably believe is unprofessional or illegal. Concerns can be directed to any member of management, preferably in writing. In addition, the Company recognizes there are instances where the reporting person may need to be assured of anonymity and have additional support and reassurance to speak up. This whistleblowing policy ensures that in both instances the report of wrongdoing is managed in a professional and confidential way.

### ***Type of Conduct to Report***

This policy is intended to cover serious concerns that could have a potential large impact on the Company and therefore the reporting under this policy can be differentiated from the normal feedback and grievance channels available to employees and external stakeholders. The Company wants to receive reports if anyone witnesses or knows about the following behavior that includes but is not limited to:

- Harassment and/or bullying
- Actions which breach any Company's policies (including social, environmental, and human rights ones).
- Actions that create an unsafe internal and/or external environment.
- Discrimination.
- Fraudulent acts.
- Illegal acts.
- Corrupt acts.
- Any conduct which is detrimental to the Company and could cause financial or non-financial loss or reputational risk.

### ***Reporting Procedure***

Depending on the nature of the wrongdoing, employees are first encouraged to discuss their concern with their Supervisor or Manager. If this is not possible, the concern may be raised with any member of management, preferably in writing.

The Company recognizes there may be circumstances where the reporting person fears victimization or reprisal for reporting wrongdoing, therefore it is necessary to provide access to a confidential whistleblower service, operated by an independent third-party provider. Through this service the reporting person can confidentially report via an internet site on an anonymous basis. The website link is found on our Company website and via the Company intranet.

In most cases, an investigation cannot continue without knowing the reporting person's identity. While remaining anonymous remains the reporting person's choice, there might be limitations on what the investigation can achieve without knowing their identity.

All reports made under this policy will be treated in a confidential and sensitive manner. Any person who in good faith reports their concern of wrongdoing will not be penalized. This includes any reprimand, reprisal, change in work duties, damage to career prospects, reputation, or threats to do any of these things to the detriment of the reporting person. The Company has in place formal misconduct procedures for any employee or individual engaged by the Company not respecting this fundamental protection of the reporting person.

### ***Investigation Procedure***

The Company recognizes that an effective and efficient investigation is an essential component of any reporting mechanism. Designated persons at the Company receive specific whistleblowing and case management training for the purposes of handling confidential and sensitive reports of corporate wrongdoing.

The following internal procedures for the investigation and follow-up of a report under this policy are as follows:

- The channels for receiving reports, in writing or orally, or both, are designed, established, and operated in a secure manner, ensuring the confidentiality of the identity of the reporting person and any third person mentioned in the report is protected and access to the report is protected from non-authorized employees.
- The acknowledgement of the receipt of the reporting person occurs within seven days.
- HR is designated as the neutral contact for following up on the reports and is responsible for maintaining communication with the reporting person and, when necessary, asking for further information from and providing feedback to that reporting person.
- The timeframe to provide feedback to the reporting person is not to exceed three months from the acknowledgment of receipt.
- The findings of the investigation and, should corrective action be needed, any action taken will be communicated to the reporting person in a reasonable timeframe.
- In some cases, to be determined on a case-by-case basis, a mediation procedure may be set up to address the concern raised (e.g. for identified cases of discrimination and/or harassment).

### ***Reporting of Information***

On an annual basis, the Company reports to the Board of Directors the following indicators:

- Number of incidents reported through the Whistleblowing Procedure.
- The number of anonymous vs non-anonymous reports received.
- The nature of the incidents reported.
- Number of confirmed incidents or legal actions.
- Number and type of disciplinary actions taken (dismissals or resignations related to misconduct).

The Company ensures this policy is understood and fit for its purpose by taking the following actions:

- The policy is included in the onboarding training for new employees.
- The individuals designated to receive reports of wrongdoing required to undertake annual professional training on investigation and case management of reports.
- This policy will be available online with the ability to be translated into different languages.

This policy is reviewed annually to ensure compliance with state and international guidance. The policy applies to all employees and contractual stakeholders. In addition to illegal activities and wrongdoing, this policy covers all breaches of the Company's policies, including its ethical, social, environmental, and human rights policies. Contact HR for additional information.