
WHISTEBLOWER POLICY

1. Our goals and commitment

Our mission is to see a world where technology is so precise and effective it works naturally with your body and the world around you, helping you thrive to your fullest potential. To achieve our mission, it's crucial that all of our employees and other associated people understand, follow, and adhere to our values and desired behaviours.

2. Why does this document matter?

We have put guidelines and policies in place to ensure we live by these values in our day-to-day work. Together with our values, we want to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values.

The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- a. every employee should have the chance to speak up anonymously when they feel we aren't adhering to our values;
- b. people have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.

We believe everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to. We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

3. Who's this document for?

This policy is from Wellfully Limited ACN 056 482 636 (**Wellfully, us, our, we**) and it's for all our employees (including previous employees), directors, officers, contractors and consultants (**you, your**). It applies to each of these people regardless of where they are or local customs or laws.

4. How to make a report

Our Whistleblower Officer is the Chair of our Audit and Risk Committee (who is also a member of our Board of Directors).

If you would like to make a report, these channels are available:

- a. contact our Whistleblower Officer via whistleblower@wellfully.net or via phone or post to our Head Office in Perth, Australia; or
- b. speak with a senior executive at Wellfully.

5. You can be anonymous

We will respect and protect your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, we will work to protect your identity and will outline and document who in the organisation will know you submitted your report. We will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that we will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

Please note that an “anonymous complaint” will only be known to the Whistleblower Officer unless you direct otherwise.

6. What will happen with a complaint

It's important for us to outline what is the process for us to investigate a report submitted through our whistleblowing channels. Below, we have provided the different steps a case

manager or member of our whistleblowing team will go through once a report is received until the case is closed.

- a. Report (anonymous or otherwise) is received.
- b. Case manager is assigned to the report to assess it and confirm its receipt.
- c. The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
- d. The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- e. The case manager will investigate and update management and the informant per policy guidelines.
- f. Once the case manager has finalised their investigation and report, management and the informant will be updated.
- g. At this point, the case manager will hand everything over to management for any subsequent action to take place.

7. How we use outside organisations/people

We may use outside organisations or people in our whistleblowing program and strategy. Examples of how we might include:

- a. Accounting Firms: to do forensic investigating of specific reports that come through our whistleblowing program.
- b. Investigative Firms: specialist investigative firms to investigate specific cases where we do not have the skills needed in-house. They are also used for investigations that we would prefer a third party execute on due to the nature of the report.
- c. Human Resources Consultants: human resources consultants might be involved in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.

8. Who is told about a complaint or report

Once a report is submitted (anonymous or not), this report goes our Whistleblower Officer. This person assesses the report and may assign it to a case manager, who will manage the investigation. Certain senior managers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner. Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared unless we're compelled by law.

9. The process to update informants

As part of our investigative process, we will update the informant of the progress of the investigation. These updates can include the following:

- a. Confirmed receipt of a report from the informant.
- b. We have begun the investigative process.
- c. The investigation is currently ongoing.
- d. The investigation has been closed.

The informant will be updated once a month while the investigation is ongoing. They will then be updated once the investigation has been closed.

We strive to provide as much feedback on the investigation as possible. However, due to our privacy guidelines, there's information that can't be shared with the informant.

10. What if you aren't happy with the result?

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the CEO (or Chair if relevant). The informant can provide this escalation in writing so that a formal review can take place. While the CEO commits to review the request, we're under no obligation to reopen the investigation. If the CEO concludes that the investigation was conducted properly and no new information exists that would

change the results of the investigation, the investigation will be concluded.

11. How we protect informants

Anonymity after reporting

After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- a. The informant has the right to remain anonymous and does not need to identify themselves at anytime during the investigation process (other than to the Whistleblower Officer).
- b. We use tools and platforms that help protect an informant's identity during and after submitting a report.
- c. At no time will we force the informant to reveal their identity.
- d. The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, we will document who will have access to their identity. This can include the case manager, Whistleblower Officer, etc.

Potential retaliation

An informant might be concerned that staff, management, or the organisation might retaliate against them. If so, we will protect the informant from:

- e. being terminated or having their employment ceased;
- f. performance management;
- g. harassment on the job or workplace bullying;
- h. warnings or disciplinary actions;
- i. discrimination; or
- j. any other action that can be perceived as retaliation for making a report.

Considered risk of retaliation

If there's a "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the Whistleblower Officer. They will take the action they feel appropriate and recommend how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include the informant: taking leave; being reassigned to other duties; or being reassigned to another location.

Already retaliated against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the Whistleblower Officer. They will take the action they feel appropriate and recommend how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include the informant: taking leave; being reassigned to other duties; or being reassigned to another location.

Retaliation inadequately resolved

If the informant feels their report of retaliation was not resolved adequately can escalate this case in writing. The report will need to go to the CEO and they will investigate the matter and process for how the retaliation was dealt with.

How we deal with retaliation

We don't tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated from their roles.

Separation of issues

We can still raise any issues related to work or performance related issues. While we will protect the informant from any retaliation, it is also important that you are still effective in their job. We can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

Directors

Mr Antonio Varano
Mr Steven Schapera
Mr Jeffrey Edwards
Mr Cameron Reynolds
Mr Anthony Wright

CEO

Mr Paul Peros

Company Secretary

Mr Henko Vos

Registered Office

284 Oxford Street
Leederville
Western Australia
6007

Contact

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www.wellfully.net
ABN: 72 056 482 636

Protection and immunity for others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

Legal protection and assistance

If in any places we operate in has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local laws prevail.

12. Our people and roles and responsibilities

Roles

The roles within our whistleblowing program include the following:

- a. Whistleblower Officer – program owner and whistleblowing protection officer;
- b. Day-to-day manager of our whistleblowing program;
- c. Case managers that investigate individual reports;
- d. Human resources who are involved in cases and made aware of specific investigations.

Responsibilities

The following are the responsibilities of each role in our whistleblowing program.

Program owner/Whistleblower Officer: This individual owns the entire program and is measured on its overall success. This includes employees knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this individual reports into the organisation, the results of their work goes directly to the Board.

Day-to-day manager: The day-to-day manager views incoming anonymous reports, assigns these reports to case managers, and manages them as they conduct investigations. This person is the first

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line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.

Case managers: Case managers are assigned anonymous reports and their role is to investigate these reports. This includes interacting and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.

Human resources: Colleagues from human resources may be called upon to provide advice and guidance during any investigation. The whistleblowing program leverages their expertise and acumen to ensure we are using HR best practices during investigations and we are treating all employees fairly.

13. Changes to this policy

From time to time, this policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations. Any changes to our whistleblowing policy will be communicated with all employees and any relevant stakeholders. This policy and any changes made do form any contract of employment.

Any changes to this policy must be approved by the CEO, Head of HR and the Whistleblower Officer. All changes will be reviewed by the Board and the Board can comment and provide feedback as necessary. All changes will also be documented in the policy and will be made available to all employees.

14. Reporting to the Board

The Board is updated every quarter on our whistleblowing program, inclusive of reports, investigations, and results. Reports or investigations carrying an undue amount of risk will be reported to the Board outside of the quarterly updates. The Board can ask about anonymous reports, investigations, as well as the state of our whistleblowing program.

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Our whistleblowing program resides in the Audit and Risk Committee of the Board. They are responsible and accountable for the implementation and effectiveness of our whistleblowing program.

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