

Whistleblower Policy Document

Confidentiality Provisions

1. Purpose

The purpose of this Confidentiality Provision is to ensure that individuals who report suspected wrongdoing or breaches of Company policy ("Whistleblowers") are afforded confidentiality to the greatest extent possible, consistent with the need to conduct an adequate investigation and comply with applicable laws.

2. Scope

This policy applies to all employees, contractors, and third parties who become aware of and report alleged misconduct within the Company.

3. Confidentiality of Whistleblower Identity

The Company will take all reasonable steps to protect the identity of the Whistleblower. Disclosure of the Whistleblower's identity will be strictly limited to those individuals within the Company who need to know in order to:

- Investigate the concern appropriately;
- Take required legal or disciplinary action; or
- Comply with applicable laws or court orders.

4. Procedures

1. Whistleblowers may submit reports anonymously if desired.
2. All received reports will be stored securely and access will be strictly limited.
3. Records of reports and investigations will be maintained in a confidential manner.
4. Any breach of confidentiality by employees will be subject to disciplinary action, up to and including termination.

5. Exceptions

Disclosure of the identity of a Whistleblower may occur if:

- Required by law or legal process;
- Necessary to prevent or lessen a serious threat to a person's health or safety; or
- With the express consent of the Whistleblower.

6. Non-Retaliation

The Company strictly prohibits retaliation against any person who reports concerns in good faith. This includes threats, harassment, demotion, suspension, or termination.

Important Notes

- Ensure all staff are aware of the confidentiality provisions and their obligations.

- Provide secure and accessible channels for reporting suspected misconduct.
- Maintain documentation of all reports and investigations with strict access control.
- Regularly review and update the policy to comply with legal requirements.
- Provide training on whistleblower protection and confidentiality to all employees.