# WHISTLEBLOWER POLICY

## 1. POLICY

This policy is intended to provide an option, when all other internal reporting avenues have been exhausted (or where employees or clients believe the normal reporting processes are not appropriate), for allegations of serious breaches of ethical, legal or regulatory standards to be brought to the attention of senior management and/or the Board.

## 2. SCOPE

The policy applies to all employees of Synergie. The procedure also applies to temporary workers, contractors and consultants providing services to or on behalf of a Synergie company or any corporate entity that performs functions for or on behalf of Synergie.

It also governs the data of individuals whose personal information is collected by Synergie, regardless of the collection method (online, paper-based, or orally).

## 3. SYNERGIE WHISTLEBLOWER PROVISIONS

All workers are encouraged to raise concerns and report instances of unethical, illegal, fraudulent or undesirable conduct, where there are reasonable grounds to suspect such conduct, without fear of intimidation, disadvantage or reprisal.

Synergie will provide support to protect persons who disclose or cooperate with disclosures in relation to violations of the Code of Conduct, Policies or any relevant law and regulations in good faith.

Persons who make a Whistleblower disclosure in good faith will have their identity remain confidential to the extent permitted by law or is practicable in the circumstances and will be protected from reprisal, harassment or victimisation for making the report. Should the person or persons experience retaliatory action by other employees, this will be treated as misconduct and such employees will be dealt with in accordance with performance and behaviour management processes.

Synergie may take disciplinary action where employees make allegations under the protection of the Whistleblower program that are unfounded or made with malicious intent. Where a Whistleblower is implicated in the reportable conduct and cooperates with investigation, the fact that they have reported the reportable conduct may be a mitigating factor when determining disciplinary action taken against them.

All cases of reportable conduct made under this Policy will be investigated in a timely, thorough, confidential, objective and fair manner as soon as possible after the matter has been reported. Where appropriate, the nominated Whistleblower Protection Officer will provide feedback to the

Whistleblower regarding the investigation progress and/or outcome (subject to considerations of privacy).

All matters raised will be treated in a confidential, secure and sensitive manner and persons who are subject to an allegation by a Whistleblower will have their identity remain confidential unless the allegations are proven.

## 4. HOW TO REPORT

Persons who would like to make a report can do so here Integrity Platform (https://synergie.integrityline.com/?lang=en)

## 5. IMPLEMENTATION AND REVIEW

All Employees shall review and agree to this policy during induction or throughout retraining processes.

This policy will be reviewed every 2 years.