

## Whistleblower Policy

**Effective Date:** 04.08.2016

**Document Status:** Approved

**Audience:** External

### 1. POLICY PURPOSE

- 1.1 Intelligent Bio Solutions Inc. and its related entities, including subsidiaries (“IBS”), aims to provide an environment where employees and others in the workplace are treated fairly and with respect. Employees are encouraged to report any wrongdoing.
- 1.2 IBS also aims to provide employees, volunteers, and contractors with a supportive work environment in which they feel able to raise issues of legitimate concern to them and to IBS, without fear of victimization, detriment or other retribution and provide suitable avenues for reporting of matters that may cause loss or damage to IBS’s reputation.

### 2. POLICY SCOPE

- 2.1 This policy covers all employees of IBS (whether full-time, part-time, or casual) and all persons performing work at the direction of, in connection with, or on behalf of IBS (for example contractors, subcontractors, agents, consultants, and temporary staff) (collectively ‘workplace participants’).
- 2.2 This policy does not form part of any employee’s contract of employment, nor does it form part of any other workplace participant’s contract for service.
- 2.3 IBS is committed to the highest standards of legal, ethical, and moral behavior. IBS will not tolerate unethical, unlawful, or undesirable conduct. This policy documents IBS’s commitment to maintaining an environment in which employees, volunteers and contractors are able to report, without fear of retaliatory action, concerns about any serious instances of wrongdoing that they believe may be occurring in the name of IBS.

### 3. COMMENCEMENT OF POLICY

- 3.1 This policy will commence from the date the employee has signed this policy. It replaces all other similar or related policies, if any, (whether written or not).

### 4. BACKGROUND

- 4.1 Intelligent Bio Solutions Inc. is a medical technology company delivering intelligent, non-invasive testing solutions to customers worldwide. The Company's Intelligent Fingerprinting Drug Screening System is revolutionizing portable testing through fingerprint sweat analysis, which has the potential for broader applications in additional fields. This highly accurate, hygienic, and cost-effective system screens for recent use of drugs commonly found in the workplace, including opioids, cocaine, methamphetamine, and cannabis. With sample collection in seconds and results in under ten minutes, this technology is a valuable tool for employers in safety-critical industries. Additionally, the Company's biosensor platform is being expanded to test for up to 130 indications, ranging from glucose to immunological conditions and communicable diseases. The Company's current customer segments include construction, manufacturing and engineering, transport and logistics firms, drug treatment organizations, and coroners.

### 5. DEFINITION

- 5.1 **Whistleblowing** means the deliberate, voluntary disclosure of individual or organizational wrongdoing by a person who has or had privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing within or by an organization that is within its ability to control.
- 5.2 **Wrongdoing** means any conduct that is dishonest, fraudulent or corrupt; illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of state or federal legislation; unethical, such as dishonestly altering company records or engaging in questionable accounting practices or willfully breaching IBS's code of conduct or other ethical statements; potentially damaging to another employee or contractor, such as unsafe work practices or substantial wasting of resources; cause financial loss to IBS or damage its reputation or be otherwise detrimental to IBS's interests or involves any other kind of serious impropriety.

## 6. REPORTING ANY WRONGDOING

- 6.1 Any employee, volunteer or contractor who detects or has reasonable grounds for suspecting wrongdoing is encouraged to raise any concerns with their immediate manager through normal reporting channels. The manager will report the allegation to the Line Manager or Management, who is responsible for ensuring the matter is properly dealt with. This may include appointing an independent investigator to inquire into the allegations. Alternatively, it may be appropriate to continue to be dealt with internally.
- 6.2 If the employee, volunteer or contractor does not believe reporting to their immediate manager through normal reporting channels is appropriate given the circumstances of the wrongdoing, the report may be made directly to the Line Manager or Management.
- 6.3 Where it is shown that a person purporting to be a whistle-blower has knowingly made a false report of wrongdoing, then that conduct itself will be considered a serious matter and that person may be subject to disciplinary action which may include dismissal, should they be matters which the person reporting the issue knows, or ought to know, have no substance.

## 7. CONFIDENTIALITY OF WHISTLEBLOWERS IDENTITY AND WHISTLEBLOWING REPORTS

- 7.1 If a person makes a report of alleged or suspected wrongdoing under this policy, IBS will endeavor to protect that person's identity from disclosure. This may not occur if confidentiality is not a practical option.
- 7.2 Generally, IBS will not disclose the person's identity unless:
- IBS employee/contractor making the report consents to the disclosure;
  - the disclosure is required or authorized by the local law and/or;
  - the disclosure is necessary to further the investigation.
- 7.3 Generally, reports made under this policy will be treated confidentially. However, when a report is investigated it may be necessary to reveal its substance to people such as other personnel of IBS, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. At some point in time, it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report. While confidentiality is maintained, in some circumstances, the source of the reported issue may be obvious to a person who is the subject of a report.
- 7.4 Unauthorized disclosure of information relating to a report, the identity of an employee of IBS, volunteer or contractor who has made a report of wrongdoing or information from which the

identity of the reporting person could be inferred will be regarded seriously and may result in disciplinary action, which may include dismissal.

## 8. PROTECTION OF WHISTLEBLOWERS

8.1 IBS is committed to protecting and respecting the rights of a person who reports wrongdoing in good faith. IBS will not tolerate any retaliatory action or threats of retaliatory action against any person who has made or who is believed to have made a report of wrongdoing, or against that person's colleagues, employer (if a contractor) or relatives. For example, the person must not be disadvantaged or victimized by having made the report by:

- Dismissal;
- Demotion;
- Any form of harassment;
- Discrimination;
- Current or future bias; and/or
- Threats of any of the above.

8.2 Any such retaliatory action or victimization in reprisal for a report being made under this policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

8.3 If a person who makes a report is implicated in the wrongdoing, that person must not be subjected to any actual or threatened retaliatory action or victimization in reprisal for making a report under this policy.

## 9. INVESTIGATION

9.1 All reports of alleged or suspected wrongdoing made under this policy will be properly assessed, and if appropriate, independently investigated with the objective of locating evidence that either substantiates or refutes the claims made by the whistle-blower. The Line Manager and/or Management, will be responsible for ensuring the proper conduct of the investigation, which may include appropriate instruction and oversight of a third party appointed to conduct an investigation. The investigation will not be conducted by a person who may be the subject of the investigation or has inappropriate links or connections (actual or perceived) to the person(s) or practice(s) under investigation.

9.2 Throughout the assessment and investigation process IBS will treat fairly the person who is the subject of a report.

## 10. REVIEW

- 10.1 This procedure will be reviewed every two years, or when legislative requirements change, or in the event of a serious occurrence involving.

## 11. VARIATIONS

- 11.1 IBS reserves the right to vary, replace or terminate this policy from time to time.

## POLICY APPROVAL

Approved By:



Harry Simeonidis  
President and CEO, Intelligent Bio Solutions

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12.11.2022

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2.0

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## POLICY ACKNOWLEDGEMENT

Employee Name:

Date:

Signature: