

<b>Whistle Blowing Policy</b>		
<b>Whistle Blowing</b>	Date: 09 May 2023	Replaces: 01 August 2019
<p><b>1. <u>Eligibility:</u></b></p> <p>This policy is applicable to all employees, clients, and suppliers of Xperien.</p>		
<p><b>2. <u>Definition:</u></b></p> <p><b>Whistleblowing</b> is the disclosure of information which relates to suspected wrongdoing.</p> <p>This may include:</p> <ul style="list-style-type: none"> <li>• Breach of company policy,</li> <li>• Statutory or regulatory requirements,</li> <li>• Unethical or immoral behaviour.</li> </ul>		
<p><b>3. <u>Purpose:</u></b></p> <p>The purpose of this policy is to outline Xperien’s procedures pertaining to reporting suspected wrongdoing within the company:</p> <ul style="list-style-type: none"> <li>• To encourages employees, clients, and suppliers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately, and their confidentiality will be respected.</li> <li>• To provide clarity to all employees, clients, and suppliers on how to raise an alarm concerning breaches of the Company’s Code of Ethical Conduct.</li> <li>• To encourage all parties involved without fear of victimization or subsequent discrimination to either confidentially or anonymously report the breach or concern rather than ignoring a situation or a concern.</li> <li>• To assure the party making the call that all investigations will proceed on a confidential basis.</li> </ul>		
<p><b>4. <u>Guiding Principles:</u></b></p> <p><b>A. Aims:</b></p> <ul style="list-style-type: none"> <li>• to encourage parties to feel confident in raising breaches and concerns.</li> <li>• To provide facilities to voice breaches and concerns and to receive appropriate feedback on any action taken.</li> <li>• To ensure that whistle blowers are protected from possible reprisals or victimization.</li> </ul> <p><b>B. Whistle Blowing Safeguards</b></p> <p>Xperien is committed to its Code of Ethical Conduct and its employees’, Suppliers’, and customers’ rights. It recognises that the decision to report a breach can be a difficult one to make.</p> <p>Xperien will protect the whistle-blower by not tolerating any harassment, victimization or</p>		

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occupational detriment.

Any investigations into allegations raised will however not influence or be influenced by any current process that may already affect an employee, supplier and Customer in terms of the companies' policies and procedures.

#### C. Whistle Blowing Confidentially

All concerns and breaches raised will be treated with the strictest confidence and every effort will be made, subject to any legal constraints, not to reveal the identity of the whistle-blower without their permission.

Circumstances may however dictate that in time it may be necessary for their identity to become known i.e. as they may be called as a witness.

#### D. Whistle Blowing Anonymously

This policy encourages that all disclosures are confidential and/or anonymous, however, we do recognise that in certain circumstances it may be the preference of the whistle-blower to report anonymously.

Concerns raised anonymously are not easily investigated due to the inability of the investigator to request additional information, however, concerns raised confidentially at the discretion of the HR Manager.

In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the detail and amount of information provided: and
- the ability of confirming the allegation from other sources.

#### E. Whistle Blowing Maliciously

Where an allegation is made in good faith, even where it is not able to be confirmed by an investigation or is subsequently proved untrue, no action will be taken against the whistle-blower. If, however an allegation is maliciously or mischievously made for personal gain or otherwise, appropriate disciplinary or legal action may be taken against the whistle-blower.

### 5. Xperien's Commitment to Whistle Blowers

Xperien will respond to all concerns raised in good faith. Where appropriate, matters raised may be investigated by management, internal audit, or through disciplinary process and in certain circumstances be referred to other investigating authorities.

In order to protect all individuals concerned, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved without the need for investigation. If, however urgent action is required this may also be taken before any investigation is conducted.

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Within ten working days of a concern being raised, the HR Manager will either institute the necessary plans for an investigation or, where more information is required after an assessment of the available information, either defer or close the case. Only with the permission of the whistle-blower will contact between the whistle-blower and the ethics or investigating officers take place. This contact will depend entirely on the nature of the matters raised and particularly the adequacy of the information provided.

Where possible and necessary, the officers involved may be required to meet in order to seek further information. Such meeting will be made with both the protection and confidentiality of the whistle-blower being paramount. Subject to any legal constraints, the whistle-blower will be kept informed of the progress and outcome of an investigation.

Xperien will take steps to minimise any negative impact that a whistle-blower may experience as a result of raising a concern and further provides the full protection afforded a whistle blower. For example, if required to give evidence in criminal or disciplinary proceedings, Xperien will provide the necessary time, resource and ensure adequate advice is provided with regard to the proceedings.

- **Roles and Responsibilities:**

It is the responsibility of all employees, clients, and suppliers of Xperien to report any suspicious wrongdoing.

**Clients and Suppliers:**

- Report any suspicious wrongdoing done by an Xperien employee to the Managing Director or the Chief Executive Officer.

**Employees:**

- Staff members must report any suspicious wrongdoing done by another staff member to Management.
- Management must report any suspicious wrongdoing done by a staff member to HR.
- Staff members must report suspicious wrongdoing done by management to the Managing Director or the Chief Executive Officer.

**Managing Director and Chief Executive Officer:**

- Take necessary steps in handling the matter at hand.

**The HR Department:**

- To investigate further for any suspicious wrongdoings reported against an employee.
- Make sure that the right procedure is followed in handling the matter at hand.