



July 01, 2024

POLICY STATEMENT REGARDING

Whistleblower Procedure

1 PURPOSE

- 1.1 It is the responsibility of BioSpectra, Inc. to ensure that it has a work environment that is safe, free of discrimination, illegal, and unwarranted conduct.
- 1.2 BioSpectra, Inc. has implemented a “See it, say it” report system to prevent any forms of unethical, abusive, or unprofessional behavior, illegal activity or other code of conduct violations or concerns.

2 SCOPE

- 2.1 This policy applies to all directors, officers, employees, volunteers, and anyone acting on behalf of BioSpectra, Inc.
- 2.2 This policy statement is referenced in the BioSpectra Employee Handbook: Section 1, Diversity.

3 RESPONSIBILITIES

- 3.1 Managers, supervisors, and employees at all levels are responsible for implementing this policy and ensuring compliance with nondiscrimination and ethical principles.
- 3.2 The enforcement of this procedure will be conducted by the BioSpectra’s leadership team. Human Resources or Senior Management will be informed of any reported issue and act accordingly.

4 IMPLEMENTATION

- 4.1 An Anonymous Hotline, ReportIT, is made available and promoted through the organization. BioSpectra utilizes this reporting platform to provide a way for employees to anonymously report concerns regarding discrimination, unlawful harassment, unethical, abusive, unprofessional and illegal conduct, as well as violations of child labor, forced labor, or human trafficking, as outlined in our Employee Handbook: Section 1 - Diversity.
- 4.2 Digital signage will be updated with postings throughout BioSpectra facilities educating employees on the ReportIT process. Each employee of BioSpectra will have the resources provided to anonymously report concerns.
- 4.3 Further information regarding the harassment definitions and complaint process can be found in the Employee Handbook: Section 1 - Diversity. The Whistleblower policy is cross listed in policy statements regarding Anti-discrimination, Fair Business Practices / Anti-Bribery and Fraud: Section: 5.3, Reporting, and Working Conditions: Section: 5 Feedback and Reporting.



5 CONTINUOUS IMPROVEMENT

5.1 We will continuously review and improve our policies, practices, and procedures related to the health, safety, and inclusion of our employees to ensure alignment with recognized principles and best practices.

6 POLICY REVIEW

6.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

Policy Approval: Authorized person name: Paul DiMarco - Title: Sr. Vice President

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