

WHISTLEBLOWING POLICY

1. POLICY STATEMENT

1.1 AOTI Inc (the "**Company**") is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct.

1.2 The purpose of this policy is:

- 1.2.1 to encourage staff to report suspected wrongdoing as soon as possible;
- 1.2.2 to ensure that employees are confident that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- 1.2.3 to provide staff with guidance as to how to raise these concerns; and
- 1.2.4 to reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy does not form part of any employee's contract of employment, and it may be amended at any time.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the Company, including senior executives, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as "**staff**" in this policy).

3. WHAT IS WHISTLEBLOWING?

3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- 3.1.1 criminal activity;
- 3.1.2 miscarriages of justice;
- 3.1.3 danger to health and safety;
- 3.1.4 damage to the environment;
- 3.1.5 failure to comply with any legal or professional obligation or regulatory requirements;
- 3.1.6 facilitating tax evasion;
- 3.1.7 financial fraud or mismanagement;
- 3.1.8 bribery and corruption;
- 3.1.9 breach of our internal policies and procedures including our Code of Conduct;
- 3.1.10 negligence;
- 3.1.11 conduct likely to damage our reputation or financial wellbeing;
- 3.1.12 unauthorised disclosure of confidential information; and
- 3.1.13 the deliberate concealment of any of the above matters.

3.2 If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer (ref. section 12, Contacts)

4. RAISING A CONCERN

- 4.1 We hope that in many cases you will be able to raise any concerns with your line manager, either in person or in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.
- 4.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer in writing. The Whistleblowing Officer undertakes an initial assessment of the matter that has been reported.
- 4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You will usually be allowed to be accompanied by a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 4.4 We will summarise your concern in writing and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. CONFIDENTIALITY

- 5.1 We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you before any disclosure.
- 5.2 Staff are free to make disclosures anonymously; however proper investigation may be more difficult or impossible if we cannot obtain further information from you. Anonymous disclosures also make it more difficult to establish whether any allegations are credible and made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

6. EXTERNAL DISCLOSURES

- 6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external and Whistleblowing Officer can advise you on this through this. They also have a list of prescribed regulators for reporting certain types of concern.
- 6.3 Although concerns usually relate to the conduct of the staff, they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in section 12 for guidance.

7. INVESTIGATION AND OUTCOME

- 7.1 Once you have raised a concern, the Whistleblowing Officer will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of this assessment. You may be required to attend additional meetings to provide further information.
- 7.2 If deemed appropriate, the concern will be forwarded to the Chair of the Audit and Risk Committee for further investigation.
- 7.3 In some cases, we may appoint an independent investigator or team of independent investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 7.4 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.5 If we conclude that you have made false allegations maliciously, in bad faith or with a view to personal gain, you will be subject to disciplinary action.

8. IF YOU ARE NOT SATISFIED

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in section 12. Alternatively, you may contact the chairman of the Board of Directors or our external auditors.

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 9.1 Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 9.2 Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone doing so will be subject to disciplinary action.

10. RESPONSIBILITY FOR THIS POLICY

- 10.1 The Board of Directors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 10.2 The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 10.3 The Whistleblowing Officer, in conjunction with the Board of Directors should review this policy

from a legal and operational perspective at least once a year.

- 10.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

11. RELATED DOCUMENTS

This policy is supported by the Company Code of Conduct.

12. CONTACTS

Whistleblowing Officer	Director Compliance *Wael Ahwal compliance@aotinc.net
Chair of the Audit and Risk Committee	Richard Cotton richardjohnncotton@gmail.com
Whistleblowing Hotline	*+1 760-425-1005
Chair of the Board of Directors	Douglas Le Fort doug.lefort@aotinc.net
External Auditors	Grant Thornton Ireland

Adopted by the Board of AOTI, Inc on 15 September 2025.