Whistleblowing Policy

Purpose

This policy allows for the anonymous reporting of information security policy violations or other suspected misconduct or illegal or unethical acts by internal entities.

Scope

Sapia.ai's Whistleblowing Policy applies to Sapia.ai's entire business, affiliates, information security infrastructure and internal and external employees or third parties.

Background

We have developed this policy to reflect our code of conduct and uphold our legal responsibility to whistleblowers who add an extra layer of security to our business.

Roles and Responsibilities

Head of GRC	Accountable owner of this policy, including revision, updates, and communication. Responsible for ensuring the online reporting portal remains secure and available.
All personnel	Responsible for reading, acknowledging, and adhering to the policy requirements.

Policy

How to Submit a Report

If you witness unethical or illegal behaviour or an information security program violation that is difficult to discuss personally, we have established an online whistleblowing portal for you to file reports. You can safely report your concerns using the details below.

You can remain anonymous, although we encourage you to put your name on your allegation whenever possible (refer to the anonymous allegations section below).

- Online portal: https://faceup.com/c/sapia

You can also scan the QR code.

Prioritisation and Acceptance Criteria

We will use the criteria from the following sections to prioritise and review submissions.

What we expect from you:

- Detailed report made in good faith or based on a reasonable belief.
    - Good Faith means truthfully reporting a concern instead of making a report with reckless disregard or willful ignorance of the facts.
    - Reasonable Belief refers to the subjective belief in the truth of the disclosure **and** that any sensible person in a similar situation would objectively believe based on the facts.
- Details of the concern (i.e., what, how, why).
- Details of the reported event, with facts (i.e., who, where, when).
- You are **not** responsible for investigating the concern or determining fault or corrective measures.

What you can expect from Sapia.ai (where possible):

- Your report will be submitted to the appropriate individual(s) for review. The online portal will tell you who will review your allegation or concern. You can choose to remove a specific individual if required.
- Protection of your identity and confidentiality (see the confidentiality section below).
- Protection against retaliation and harassment, such as termination, compensation decreases, poor work assignments and threats of physical harm.
    - If you believe you are being retaliated against, contact your line manager, a member of the senior leadership team, or the CEO (as appropriate) immediately.
    - Any proven retaliation or harassment against you will result in disciplinary action.
    - CAVEAT: Your right to protection against retaliation does not include immunity for any personal wrongdoing alleged in the report and investigated.
- Due process for you and any accused individual(s).
- Corrective actions are taken to resolve a verified violation and a review and enhancement of applicable policies and procedures, if necessary or appropriate.
- Advice and support in understanding your rights as a whistleblower.

Confidentiality

All concerns will be treated in confidence, and every effort will be made not to reveal your identity if that is your wish. It may be necessary to disclose your identity when a thorough investigation, compliance with the law, or due process for accused members is required. If disciplinary or other proceedings follow an investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Anonymous allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are, it will be much more difficult for us to protect your rights.

Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of Sapia.ai. In exercising this discretion, the factors to be taken into account would include the following:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

Untrue allegations

If you make an allegation in good faith and reasonably believe it to be true, but any investigation does not confirm it, we will recognise your concern, and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action, which could include disciplinary action, may be taken.

Legal rights and protection for whistleblowers

Whistleblower protection legislation may vary depending on the country where you live. We have included some helpful links below, but please do your due diligence on the protections offered in your home country before making a report.

- Australia: https://www.fwc.gov.au/registered-organisations/whistleblowing
- United Kingdom: https://www.acas.org.uk/whistleblowing-at-work
- United States of America: https://www.dol.gov/general/topics/whistleblower

Revision History

Version	Date	Author	Description of Changes
1.0	24/02/2022	Phil McLean	Initial policy created
2.0	21/03/2022	Nathan Hewitt	Rebranded from PredictiveHire to Sapia.ai
2.1	01/08/2023	Tamara Watson	Annual policy review
3.0	15/05/2024	Jon Daye	Policy re-written with guidance from ISO / SOC auditors and included the launch of the FaceUp application
3.1	19/05/2025	Jon Daye	Annual review. Ensured links are still valid
3.2	21/05/2026	Jon Daye	Annual review. Ensured links are still valid.
3.4	01/07/2026	Jon Daye	Telephone number removed as this is no longer available to file reports.