

Orbx Investments Limited and Subsidiaries

Global Whistleblower Policy

1. Objectives

Orbx Investments Limited and its subsidiaries (together, **Orbx** or the **Group**) are committed to acting and conducting their business honestly, fairly, with integrity and in line with the law. Orbx expects all of its personnel to maintain high standards consistent with Orbx's Conduct and Standards Policy and values.

A culture of openness and accountability is essential for Orbx to detect wrongdoing and address it quickly if it does occur. Usually, the best source of information about whether Orbx and its people are living up to Orbx's values is its personnel.

Speaking up about your concerns helps Orbx identify wrongdoing that may not otherwise be uncovered. The purpose of this policy is to encourage the reporting of concerns as soon as possible.

2. Who does this policy apply to?

This is Orbx's Global Whistleblower Policy. This policy covers Orbx Investments Limited and its subsidiaries. It covers all whistleblowing concerns raised by the following people (and their relatives, dependents and spouses):

- any of Orbx's current and former directors, officers and employees and, for the purpose of this policy, contractors, consultants, agency workers, seconded workers, volunteers, interns and any other person engaged by Orbx (**Orbx Personnel**); and
- any of Orbx's current and former suppliers of goods or services (whether paid or unpaid),

(referred to in this policy as **you**).

If any Group entity has more specific policies or procedures in relation to whistleblowing which apply to you, the more specific policy or procedure will prevail to the extent of any inconsistency with this policy.

References to "**your Relevant Person**" in this policy should be read based on your employment status; for example if you are an employee it means your Manager, if you are a contractor or consultant it means the person you negotiated your engagement with. If you are unsure about who your Relevant Person is please seek clarity before confirming that you have read and understood this policy.

Please note that this policy is not part of any contract of employment and may be amended by Orbx at any time.

3. What is a whistleblowing concern?

Whistleblowing is the disclosure of information where you have reasonable grounds to suspect that it concerns misconduct, serious wrongdoing, or an improper state of affairs or circumstances in relation to Orbx. In this policy, such matters are referred to as “**whistleblowing concerns.**” A person who raises a whistleblowing concern is referred to in this policy as a “**whistleblower.**”

A whistleblowing concern does not have to involve a breach of a particular law. It might involve a systemic issue that Orbx needs to know about and fix or it might relate to behaviour that is prohibited by Orbx’s Conduct and Standards Policy.

For example, a whistleblowing concern could include situations where you have reasonable grounds to suspect that Orbx or any Orbx Personnel have engaged in conduct involving:

- criminal activity;
- miscarriages of justice;
- failure to comply with any legal or regulatory requirements;
- danger to health and safety or to the environment;
- bribery or corruption;
- tax evasion or misconduct in Orbx’s tax affairs;
- financial fraud or mismanagement;
- behaviour that harms or is likely to harm Orbx’s reputation or financial well-being;
- bullying, sexual or other harassment or any other breach of Orbx’s Conduct and Standards Policy;
- a breach of Orbx’s other internal policies and procedures;
- detrimental conduct against a person who has raised a whistleblowing concern, or is believed or suspected to have raised or be planning to raise a whistleblowing concern; or
- the deliberate concealment of any of these matters.

This policy should not be used for complaints relating only to your own personal employment circumstances or personal work-related grievances. These are grievances that relate to Orbx Personnel’s current or former employment with Orbx and that have implications for that individual personally but that don’t relate to any conduct or alleged conduct giving rise to a whistleblowing concern of the kind described above. For complaints related to your own personal circumstances, Orbx Personnel should raise the matter in accordance with our Grievance Procedure.

There may be situations where a personal work-related grievance also gives rise to a whistleblowing concern; for example, where the complaint includes information about both a whistleblowing concern and a personal work-related grievance or where the personal work-related grievance relates to Orbx breaking the law. In these cases, where reasonably practical, Orbx may separate the complaint into a whistleblowing concern, and a personal work-related grievance and address them in accordance with their respective policies and procedures.

If you deliberately make false allegations then you may be subject to disciplinary action and you may not be able to access the whistleblower protections under applicable law. Making a false allegation is where you raise a concern that you know to be untrue. It is not the same as raising a

genuine whistleblowing concern that turns out to be mistaken (see section 7 below). If you are not sure whether something falls under this policy, please contact the Whistleblowing Officer (see section 4).

4. How do I raise a whistleblowing concern?

Orbx encourages all Orbx Personnel to continue to feel able to raise everyday issues informally with their Relevant Person, who may be able to resolve them quickly and effectively. In some cases, the issue may also give rise to a whistleblowing concern. If a whistleblowing concern is raised, you or your Relevant Person must refer it to the Whistleblowing Officer. Your Relevant Person may ask to pass on your name to the Whistleblowing Officer.

The Group's CEO currently serves as the Whistleblowing Officer and can be contacted by email at anna@orbxsystems.com or by telephone on +61 410 665 255.

5. Confidentiality and anonymity

Orbx knows that speaking up can feel difficult.

You can raise a whistleblowing concern anonymously (for example, by way of an email from an anonymous account) and still be protected under this policy and applicable law. But it may be difficult or impossible for Orbx to properly investigate a whistleblowing concern if Orbx cannot obtain further information from you. Whistleblowers wishing to remain anonymous should keep talking with Orbx so that Orbx can ask follow-up questions or provide feedback.

For whistleblowers who do not remain anonymous, Orbx will take reasonable steps not to disclose the identity of the whistleblower unless the whistleblower consents to the disclosure, the disclosure is made to a legal practitioner for the purpose of obtaining legal advice, the disclosure is required to be made to a regulator or a court or the disclosure is otherwise required or permitted by law.

In addition, Orbx will take reasonable steps not to disclose information that is likely to lead to the identification of a whistleblower except in the circumstances where it would be permitted to disclose the person's identity (see above) or to the extent such disclosure is reasonably necessary as part of the reporting or investigation of a whistleblowing concern.

6. External disclosures

This policy is an internal mechanism for reporting, investigating and remedying whistleblowing concerns in Orbx's workplace. In most cases, Orbx Personnel shouldn't find it necessary to alert anyone externally.

Orbx encourages you to seek independent legal advice about whether a disclosure qualifies for protection before raising a concern externally.

7. Protection and support

Whether or not a whistleblowing concern qualifies for legal protection in your place of work will depend on a number of factors, including: your location, your relationship to Orbx, what the concern is about, and who the concern is raised with. If you are not sure whether something will qualify for legal protection, please contact the Whistleblowing Officer or seek independent legal advice.

Orbx will tailor how it protects those who raise whistleblowing concerns, depending on the circumstances. For example, Orbx may appoint someone, who is not the Whistleblowing Officer and not connected with the whistleblowing concern, to act as the point of contact and to support and help protect a whistleblower. They will be able to arrange any additional support and escalate any issues the whistleblower has with how their whistleblowing concern is being dealt with. Orbx may only be able to do this if the whistleblower agrees to share their identity with the support person.

Orbx will not tolerate detrimental treatment against whistleblowers in any form. This includes dismissal, discrimination, harassment or intimidation, disciplinary action, threats or other unfavourable treatment connected with raising a whistleblowing concern. If you engage in detrimental treatment against a whistleblower then you may be subject to disciplinary action. In some cases the whistleblower could sue you personally in court. Whistleblowers should seek independent legal advice before seeking compensation for detrimental treatment through the courts.

Orbx encourages you to tell the Whistleblowing Officer if you think you or someone else has suffered any detrimental treatment. If the matter isn't remedied, this should be raised formally either by raising a new whistleblowing concern or by raising the matter in accordance with our Grievance Procedure. Orbx will investigate detrimental treatment claims separately from the investigation of the initial whistleblowing concern.

8. Investigation and outcome

If Orbx can contact a whistleblower (including through anonymous channels), Orbx will acknowledge receipt of their whistleblowing concern within a reasonable period.

Orbx will carry out an initial assessment of the whistleblowing concern so that Orbx can:

- determine whether it falls within this policy;
- determine whether any further investigation is needed and the scope of any investigation;
- assess the risk of the whistleblower's identity becoming known or of the whistleblower or any other person suffering detrimental treatment; and
- determine any steps required to mitigate those risks.

If Orbx can contact the whistleblower (including through anonymous channels) then Orbx will let the whistleblower know the outcome of its initial assessment. Orbx might still need to contact the whistleblower again to get more information.

Orbx may appoint one or more investigators, which may include Orbx Personnel or other appropriate qualified people. Any investigation will be objective, fair and independent.

If a whistleblowing concern mentions or relates to Orbx Personnel then they will generally be informed of the substance of any adverse comment about them that may be included in any report or other document arising out of an investigation, and be given a reasonable opportunity to respond.

Orbx will aim to keep whistleblowers informed of any investigation and the timescale. The need for confidentiality may prevent Orbx giving a whistleblower specific details of any investigation or any action taken as a result. You must keep confidential any information that you are given about an investigation.

Any investigation and its outcome will be reported internally as appropriate including to the CEO and, if material, to the Board.

9. Availability and accessibility

This policy is part of the induction process for all Orbx Personnel and is available on Orbx's intranet site and shared drives.

10. Review and responsibility

The Board is responsible for this policy and monitoring and reviewing its operation. The Whistleblowing Officer has day-to-day operational responsibility for this policy and must take reasonable steps to ensure that all Leaders and other employees who may deal with concerns or investigations under this policy receive training about this policy and their obligations under it.

This policy may be amended by resolution of the Board of Directors, from time to time, to ensure that it is operating effectively.

Approved by the Board of Directors of Orbx Investments Limited.