

LIPA PHARMACEUTICALS LTD

21 Reaghs Farm Road, MINTO NSW 2566

 HUMAN RESOURCES POLICY	
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I. OBJECTIVE

Lipa Pharmaceuticals Limited ("Lipa") is committed to conducting its business honestly, ethically and in compliance with all applicable laws and regulations.

Lipa encourages employees and other people connected with the business to speak up if they become aware of misconduct, unethical behaviour or any breach of law, policy or company values.

The purpose of this Policy is to:

- provide a safe process for reporting concerns;
- protect individuals who report concerns in good faith;
- support the investigation of reported matters;
- ensure reports are handled fairly, confidentially and appropriately; and
- comply with Australian whistleblower protection laws.
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Lipa will not tolerate retaliation, victimisation or detrimental treatment of any person who makes a report under this Policy in good faith.

II. SCOPE

Who Can Make a Disclosure?

This Policy applies to current and former:

- employees;
- directors and officers;
- contractors, consultants and suppliers; and
- relatives, dependants or spouses of the above.

What Can Be Reported?

This Policy applies to actual or suspected:

- illegal, fraudulent, corrupt or unethical conduct;
- breaches of laws, regulations or Lipa policies;
- serious misconduct;
- financial wrongdoing;
- health, safety or environmental risks;
- discrimination, harassment or bullying; and
- attempts to conceal any of the above.

Matters Generally Not Covered

Personal employment matters are generally managed through Lipa's grievance, HR or workplace conduct processes.

Examples include:

- interpersonal conflicts;
- performance management;
- promotion decisions; and
- ordinary disciplinary matters.

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However, a matter may still be reported under this Policy if it involves misconduct, unlawful conduct, retaliation or a breach of whistleblower protections.

III. PROTECTION

People making a report should act honestly and have reasonable grounds for their concerns.

Anyone who makes a report in good faith will be protected, even if the concern is later found to be unsubstantiated.

Lipa will not tolerate retaliation or adverse treatment against anyone who makes, may make, or is believed to have made a report.

This includes:

- dismissal or disciplinary action;
- demotion or loss of opportunity;
- discrimination, bullying or harassment;
- threats or intimidation; and
- reputational or financial harm.

Any employee who victimises or retaliates against a reporter may face disciplinary action, including termination of employment.

Where appropriate, Lipa may take steps to protect a reporter during an investigation.

IV. CONFIDENTIALITY

Lipa will handle whistleblower reports confidentially wherever possible.

The identity of a reporter will only be disclosed:

- with the reporter's consent;
- where required or authorised by law;
- to persons involved in investigating or responding to the report where disclosure is reasonably necessary; or
- to legal advisers, regulators, law enforcement agencies or other authorities where legally permitted.

Information likely to identify a reporter will be protected and access will be limited to those with a legitimate need to know.

Any employee who improperly discloses the identity of a reporter or confidential information relating to a report may face disciplinary action.

V. PROCEDURES

Making a Report

A report may be made to:

- a Supervisor or Manager;
- Human Resources;

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- the Chief People, Culture and Safety Officer;
- the Chief Executive Officer; or
- whistleblower@ck-lifesciences.com

Reports may be made anonymously. Where possible, reporters should provide enough information to assist with any investigation.

Investigation Procedures

The way a report is investigated will depend on the nature of the concern.

Reports may be investigated by Lipa management, Human Resources, internal audit, external advisers or other authorised persons. Where appropriate, matters may also be referred to regulators or law enforcement authorities.

Where contact details are available, Lipa will generally acknowledge the report, assess the matter, investigate where appropriate and advise the reporter when the matter has been finalised.

Reporting About Senior Management

If a report concerns, the Chief Executive Officer, or another person who would normally manage the investigation, the matter will be referred to an independent person or CK Life Sciences for review.

Fair Treatment

All reports will be handled fairly, impartially and confidentially. Individuals who are the subject of a report will be treated fairly and given an opportunity to respond where appropriate.

VI. ANONYMITY

Anonymous disclosures are accepted under this Policy.

Lipa recognises that anonymous reports can make investigations more difficult; however, anonymous reports will be assessed and investigated to the extent reasonably possible.

A person may choose to remain anonymous:

- when making a report;
- during an investigation; and
- after the investigation has been completed.

VII. PRIVACY

Lipa will collect, use, store and disclose personal information relating to whistleblower reports only for legitimate business, legal and investigation purposes.

Personal information will be handled in accordance with:

- the Privacy Act 1988 (Cth);

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- Australian Privacy Principles; and
- Lipa's Privacy Policy.

Information may be disclosed to investigators, legal advisers, regulators, law enforcement agencies or other parties where permitted or required by law.

VIII. CONSISTENCY WITH LAWS AND REGULATIONS

This Policy shall be read in conjunction with all applicable Australian laws, regulations and regulatory guidance.

Where there is any inconsistency between this Policy and an applicable law, the law will prevail to the extent of the inconsistency.

Nothing in this Policy limits any rights or protections available under Australian whistleblower legislation.

IX. RESPONSIBILITY FOR THIS POLICY

This Policy is approved by the Chief Executive Officer.

The Chief People, Culture and Safety Officer is responsible for:

- administration of this Policy;
- oversight of investigations;
- review of policy effectiveness;
- recommendations for improvement; and
- periodic reporting to senior management on policy operation.

This Policy will be reviewed periodically and updated as required.

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Appendix A – Australian Whistleblower Rights

Australian law protects eligible whistleblowers who report misconduct or suspected misconduct.

A person who makes a report under this Policy may:

- remain anonymous;
- be protected from victimisation or retaliation;
- have their identity kept confidential where required by law;
- report concerns directly to relevant regulators; and
- have access to legal protections and remedies available under Australian law.

Nothing in this Policy prevents a person from reporting concerns to an appropriate regulator or government authority where permitted by law.

If you see something that concerns you, speak up. Lipa encourages people to raise genuine concerns and is committed to protecting those who do so in accordance with this Policy.