

Whistleblower Policy

Purpose

HPG is committed to conducting all business activities fairly, transparently, honestly, and in full compliance with all legal and regulatory standards. To uphold this commitment, it is necessary to have a clear and robust whistleblower policy. The goal of this policy is to ensure that all reports or concerns about improper, unethical, or illegal behavior or circumstances involving HPG's property, personnel, suppliers, customers, or any other third parties associated with HPG's activities are handled effectively, securely, appropriately, and in full compliance with the law. HPG encourages all members and partners to report these concerns and will provide guidance and channels to do so.

Scope

This policy applies to all HPG entities and personnel (including directors, shareholders, executives, employees, contractors, consultants, and interns) regardless of the team or office they work in. It also covers any actions or concerns related to HPG suppliers, customers, or any other third parties with whom HPG has dealings.

Reportable conduct

HPG encourages all personnel to report any behavior or situation that they find concerning. This broadly falls into two categories:

Category One: Threats to company reputation or financial holdings

The first category relates to behavior that could harm (Company)'s reputation or financial health. The list below provides guidelines on what should be reported, but it is not exhaustive, and personnel are encouraged to use their best judgment if they witness concerning behavior that falls outside of the listed items.

- Fraud
- Theft
- Embezzlement
- Corruption
- Blackmail
- Harassment
- Bribery
- Financial malpractice
- Tax evasion
- Information security concerns

- Failure to comply with legal or professional obligations.
- Failure to comply with regulatory requirements.
- Conduct that threatens HPG's reputation or financial well-being.
- Actions that would endanger the health or safety of HPG personnel or the public.
- Actions that cause damage to the environment.
- Unauthorized disclosure of confidential information.

Category Two: Concerns regarding the well-being and effectiveness of personnel

The second category that should be reported includes actions or concerns related to the effectiveness and productivity of HPG personnel. This is a broader category of behaviors. If you are concerned about the well-being of a colleague or have a suggestion for how HPG could improve the workplace or environment, HPG encourages you to raise the issue.

Unlike category one concerns, HPG cannot guarantee that each issue will be addressed. However, HPG is committed to making the workplace as open, transparent, and pleasant as possible. Issues that could be addressed include, but are not limited to:

- Concerns about a colleague's emotional, mental, or physical health.
- Suggestions for how to improve the workplace.
- Concerns about discrimination, exclusion, or other forms of unfair treatment.
- Concerns about a colleague's behavior, such as sexual harassment, threatening behavior, or behavior that makes other personnel uncomfortable.

How to Report

Speak to your supervisor.

The first and preferred method for raising concerns is to speak to your direct supervisor. You can send an email requesting a meeting and raise the issue in person.

If the whistleblower wishes to remain anonymous or is concerned that their supervisor is somehow involved in the concerning activity, or if they believe their supervisor's response is insufficient, they may raise the concerns with a member of (Company) who should be aware of the issue.

Use the anonymous whistleblowing system.

In the case that you wish to remain anonymous, an alternative option is to use the FaceUp whistleblowing system (<https://faceup.com/c/speakup12>). To do so, enter the following access code: **58sd12**. Select the appropriate category for your concern and provide any relevant details to understand the issue. Once you submit the report, you will receive a case code. You can return to the FaceUp platform at any time to track the progress of your report. This case code is also useful for another reason. If the person who received your report needs more information, they can reach out and ask more questions while your anonymity remains protected.

Report to appropriate authorities (exceptional cases)

Finally, HPG recognizes that there may be exceptional circumstances where it is necessary to consult an external third party such as a regulator or the police. HPG strongly advises seeking guidance and advice before going to a third party. This guidance and advice can come from whistleblowing support groups, or the government agency that oversees whistleblowing issues. Consult your local laws for the most appropriate guidance for your personnel.

Investigation

Once a report has been received it will be referred to the HR Business Partner who will report it to the relevant senior management team member as appropriate, giving details of the report, including:

- Date and substance of the report.
- Identity and level of seniority of the alleged wrongdoer(s).
- Level of risk associated with the alleged wrongdoing.

If the report is deemed credible, the assigned senior management will continue the investigation and may contact the whistleblower through the FaceUp app to get more information. If the report is found to be intentionally false, the whistleblower will face disciplinary action.

Company Response

In the event that illegal activity is discovered, HPG will refer the case to the proper authorities and provide all of the evidence gathered. In the case of legal but concerning activity, HPG will respond on a case-by-case basis, ranging from providing support to affected personnel to dismissal if a person is found to be behaving in a way that violates the terms of their contract or is contributing to a hostile work environment.

Protection for Whistleblowers

HPG will take necessary measures to protect the whistleblower's identity and protect them from retaliation. Harassment, discrimination, or retaliation against the whistleblower will not be tolerated. Any form of retaliation will be seen as grounds for disciplinary action or dismissal.