

WHISTLEBLOWER POLICY

May 2023

At **Lumineye Pty Ltd**, we pride ourselves on upholding the highest standards of ethical conduct and are dedicated to fostering a workplace built on trust, integrity and care. We believe that open communication and transparency are essential in ensuring that our business operates in accordance with applicable laws, regulations and policy guidelines. With this in mind, we have established our Whistleblower Policy; a testament to our commitment to creating a safe and supportive environment for all.

Our Compassionate Approach We understand that speaking up about wrongdoing can be a daunting task. Therefore, we want to assure every member of our Lumineye family that we value your voice and deeply care about your well-being. Our Whistleblower Policy is designed to encourage and empower employees to report any suspicions of misconduct, without the fear of reprisal, victimisation or discrimination. We believe that your courage and honesty play an invaluable role in upholding the ethical fabric of our organisation.

Secure Reporting Channels To provide a secure and confidential platform for expressing concerns, we have implemented a dedicated reporting mechanism. Each employee will have access to a conveniently located safe box, symbolising the trust and confidentiality we place in this process. Rest assured, the safe box will be securely locked, with access exclusively granted to our senior management staff. These individuals have been carefully chosen for their integrity and commitment to maintaining strict confidentiality.

Embracing Support and Protection At Lumineye, we stand firm against any form of retaliation towards our whistleblowers. We are fully committed to safeguarding the well-being and rights of those who bravely step forward. Any employee found to have acted inappropriately or retaliated against a whistleblower will face swift and decisive disciplinary action, including potential termination. We believe in nurturing a culture of trust, where your willingness to raise concerns is met with appreciation and support.

Confidentiality and Thorough Investigation We place the highest importance on maintaining the confidentiality of every report received. Each concern will be handled with the utmost care and sensitivity. Our appointed whistleblower or our esteemed company CEO will diligently investigate all

reports to establish their validity. Throughout the investigation process, we will make every effort to consult with the whistleblower, ensuring their involvement and providing reassurance. Should a report be substantiated, we will share the findings, actions taken, and implemented corrective measures with the whistleblower, aiming to prevent future occurrences.

Together, we create an Ethical Work Environment Above all, Lumineye strives to cultivate a work environment where openness, fairness and respect thrive. We encourage all employees to embrace their role as ethical guardians, knowing that their commitment to reporting misconduct strengthens our collective integrity. By upholding the highest ethical standards in all our operations, we build a brighter future; one that celebrates accountability, transparency and a genuine care for one another.

Remember, your voice matters. Together, let us illuminate the path of ethical excellence at Lumineye.

Victor Arutjunow

CEO