



# WHISTLE-BLOWER PROTECTION POLICY

## 1. Introduction

In line with Way With Words' commitment to conducting its business honestly, in compliance with applicable laws and regulations and in an ethical manner, the company is mindful of the need to provide a means for employees and contractors of the company to raise serious concerns about inappropriate conduct in the knowledge that they will be protected from reprisals for whistle-blowing. This policy is designed for that purpose.

## 2. Reporting

Any employee who has reasonable grounds to suspect that a violation has occurred of Way With Words' Anti-Bribery and Anti-Corruption Policy or of its Anti-Slavery Policy (these two policies are collectively referred to as the "ABCS Policies"), or of any law or regulation relating to any other matter which governs the conduct of Way With Words' business, is encouraged to share those concerns with the company's Compliance Officer. Any concerns which a contractor may have, whether relating to matters of law, regulation or the ABCS Policies, should be addressed directly to the Compliance Officer at the following email address: [compliance.officer@waywithwords.net](mailto:compliance.officer@waywithwords.net).

## 3. Compliance Officer

Way With Words' Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. All reports made will be promptly investigated and appropriate corrective action taken, where it is deemed warranted by the results of the investigation.



## 4. Acting in Good Faith

Anyone raising a complaint concerning a suspected violation of the ABCS Policies, or any law or regulation relating to any other matter which governs the conduct of Way With Words' business, must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates a violation. Any employee making allegations that prove not to be substantiated and to have been made maliciously or in the knowledge that they are false will be subject to disciplinary action. The company will terminate its relationship with any contractor who knowingly makes such false or malicious allegations.

## 5. No Retaliation

No employee or contractor who, in good faith, reports a suspected violation of the Policies or of any law or regulation will suffer harassment, retaliation or adverse employment or contractual consequence. Any employee who retaliates against someone who has, in good faith, reported a suspected violation will be subject to disciplinary action, up to and including termination of employment. The company will terminate its relationship with any contractor who similarly retaliates against a whistle-blower who has acted in good faith.

## 6. Confidentiality

Reports of violations or suspected violations will be kept confidential, if the complainant so requests, to the extent that it is possible to do so in the context of conducting a proper investigation.