

# GENUMARK INC.

## Whistleblower Protection Policy

Effective Date: March 2026 | Version 1.0

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| <b>Document Owner</b>   | Chief Executive Officer                  |
| <b>Approved By</b>      | Mitch Freed, CEO                         |
| <b>Review Frequency</b> | Annual                                   |
| <b>Next Review Date</b> | March 2027                               |
| <b>Distribution</b>     | All employees, published on genumark.com |

### 1. Purpose and Commitment

Genumark Inc. is committed to maintaining the highest standards of ethical conduct, transparency, and accountability. This Whistleblower Protection Policy establishes Genumark's commitment to protecting any individual who, in good faith, reports concerns about suspected wrongdoing, misconduct, or violations of law, regulation, or company policy.

Genumark recognizes that an effective grievance and complaints mechanism depends on the willingness of individuals to come forward. This policy exists to ensure that no person will face adverse consequences for raising legitimate concerns, whether through Genumark's Grievance and Complaints Mechanism or through any other reporting channel.

**Genumark will not tolerate retaliation of any kind against whistleblowers.**

### 2. Scope

This policy protects any individual who reports a concern in good faith, including:

- Current and former employees of Genumark Inc.
- Contractors, consultants, and temporary workers
- Clients, suppliers, vendors, and business partners
- Community members and members of the public
- Any person who participates in, cooperates with, or provides information during an investigation

This policy applies to all reports made through any channel, including Genumark's Grievance and Complaints Mechanism, direct reports to management, reports to People & Culture (P&C), reports to external regulators, or any other means of disclosure.

### 3. Protected Disclosures

A protected disclosure is any report made in good faith concerning suspected or actual:

- Violations of laws, regulations, or legal obligations
- Fraud, theft, corruption, or financial misconduct
- Threats to health, safety, or the environment
- Violations of Genumark's Code of Conduct or company policies
- Discrimination, harassment, or abusive conduct
- Unethical business practices, including those related to client relationships or supply chain conduct
- Attempts to conceal any of the above

A disclosure is made in good faith when the reporter has a reasonable belief that the information is true at the time of reporting, regardless of whether the concern is ultimately substantiated.

## 4. Protection from Retaliation

### 4.1 Definition of Retaliation

Retaliation is any adverse action taken against an individual because they made a protected disclosure or participated in an investigation. Retaliation includes, but is not limited to:

- Termination, suspension, or demotion
- Reduction in compensation, benefits, or hours
- Involuntary transfer or reassignment
- Negative performance evaluations or references that are not based on legitimate performance concerns
- Threats, intimidation, harassment, or bullying
- Exclusion from meetings, projects, or professional opportunities
- Coercion, restraint, or any other action designed to discourage reporting
- Refusal to engage in future business dealings (for external stakeholders) based on the filing of a grievance

### 4.2 Genumark's Commitment

Genumark commits to the following protections for all whistleblowers:

- No individual will be subject to adverse action for making a protected disclosure in good faith
- Genumark will take all reasonable steps to preserve the confidentiality of the whistleblower's identity
- Where a whistleblower's identity must be disclosed (for example, to conduct a fair investigation or comply with legal requirements), the whistleblower will be informed in advance and their consent will be sought before disclosure
- Genumark will conduct a risk assessment for any whistleblower who may face heightened vulnerability, including external stakeholders, junior employees, or individuals in precarious working arrangements
- Whistleblowers will be kept informed of the progress and outcome of investigations to the extent consistent with confidentiality requirements

## 5. Consequences for Retaliation

Genumark treats retaliation against a whistleblower as a serious violation of this policy and of Genumark's values. Any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including:

- Written warning
- Mandatory retraining on this policy and Genumark's Code of Conduct
- Suspension with or without pay
- Demotion or reassignment
- Termination of employment
- Termination of business relationship (for external parties)

Disciplinary action for retaliation will be determined based on the severity of the retaliation, the intent of the retaliator, and the impact on the whistleblower. Managers and supervisors have a heightened responsibility to prevent retaliation within their areas of oversight. Failure to act on known or suspected retaliation may itself constitute a policy violation.

## 6. Mechanisms to Ensure Whistleblower Protection

Genumark has implemented the following mechanisms to ensure the effectiveness of whistleblower protections:

### 6.1 Confidentiality Safeguards

- All reports are received and managed by the Grievance Review Committee, which operates under strict confidentiality obligations
- Information related to a disclosure is shared only on a need-to-know basis with individuals directly involved in the investigation
- The whistleblower's identity will not be disclosed to the subject of the complaint without the whistleblower's prior consent, unless required by law
- All investigation files and records are stored securely with restricted access
- Anonymous reporting is available through the online grievance form and by mail

### 6.2 Monitoring and Risk Assessment

- Following a disclosure, the Grievance Review Committee will monitor the whistleblower's situation for a minimum of 12 months to identify any signs of retaliation
- For whistleblowers assessed as facing heightened risk, additional protective measures may be implemented, including reassignment of reporting lines, adjusted work arrangements, or engagement of independent third parties to monitor the situation
- Whistleblowers may report suspected retaliation at any time through the same channels used for the original disclosure

### 6.3 Training and Awareness

- All employees will receive training on this policy upon hire and annually thereafter
- Managers and supervisors will receive enhanced training on their responsibilities to prevent retaliation and support whistleblowers
- This policy and the Grievance and Complaints Mechanism will be published on genumark.com and communicated to all stakeholders

### 6.4 Independent Review

In cases involving senior leadership or where internal impartiality may be a concern, Genumark will engage an independent third party to manage the investigation and assess risks to the whistleblower.

## 7. Reporting Suspected Retaliation

Any individual who believes they are experiencing retaliation for making a protected disclosure should report the suspected retaliation through any of the following channels:

- Online: [genumark.com/grievance](https://genumark.com/grievance)
- Email: [grievances@genumark.com](mailto:grievances@genumark.com)
- Mail: Genumark Inc., Attention: Grievance Review Committee
- Direct report to any member of the Grievance Review Committee or to the CEO

Reports of retaliation will be treated as a separate grievance and investigated promptly. Where retaliation is substantiated, Genumark will take immediate corrective action and implement measures to prevent recurrence.

## 8. External Reporting Rights

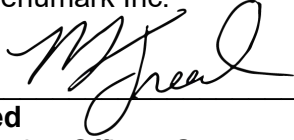
Nothing in this policy prevents any individual from reporting concerns to external regulatory authorities, law enforcement, or other competent bodies. Genumark will not take any adverse action against an individual for making a report to an external authority in good faith.

## 9. Governance and Review

This policy is owned by the CEO of Genumark Inc. and administered by the Grievance Review Committee. It will be reviewed annually and updated as necessary to reflect changes in law, regulatory requirements, best practices, or organizational needs. Any material changes will be communicated to all stakeholders.

## Approval

This Whistleblower Protection Policy has been reviewed and approved by the undersigned on behalf of Genumark Inc.



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**Mitch Freed**

Chief Executive Officer, Genumark Inc.

Date: March 31, 2026