



WHISTLEBLOWER PROTECTION POLICY

This document is for both Proteomics International Laboratories Ltd and its wholly owned subsidiary Proteomics International P/L (both "**Proteomics International**"). It is based on the ASX whistle blower policy of 3 Dec 2018.

Introduction

Proteomics International is committed to maintaining a high standard of integrity, quality of results and good corporate governance.

This Whistle blower Protection Policy (Policy) forms part of Proteomics International's risk management framework, which includes Proteomics International's Code of Conduct, Share Trading Policy and Corporate Governance Statement.

A critical component of Proteomics International's strategy is maintaining its reputation for delivering its services in a reliable and credible manner. This is reflected in the strategic pillars of ground-breaking research and quality analytical services and means that Proteomics International must put its reputation at the centre of everything it does.

The Policy is also underpinned by the Proteomics International values to:

- Be open, honest, and trustworthy
- Generate reliable data and results of the highest quality

What does this Policy do?

You may have concerns about conduct within Proteomics International which appears to you to be illegal, unethical or otherwise improper, but you may feel apprehensive about raising your concerns because of the fear of possible adverse repercussions to you. This might be the case, for example, if your concerns relate to conduct of your immediate manager.

The aim of this policy is to make you feel confident about raising concerns internally, by offering a reporting and investigative mechanism that is objective, confidential, independent and protects you from reprisal or disadvantage.

Under this Policy:

- you are encouraged to report your concerns, whether openly or, if preferred, anonymously
- if you report your concerns, you will be afforded confidentiality unless you indicate (or the law requires) otherwise
- concerns reported by you will be properly investigated with a view to establishing the truth and correcting any wrongdoing where possible
- you will be advised of the outcome of the investigation and any action taken as much as practicable
- you will not be victimised or adversely affected because of your action in reporting your concerns provided of course, that there is a basis for your concerns, and that you have acted in good faith and without malicious intent

Who does this Policy apply to?

This Policy applies to: anyone who is or has been employed by or worked with Proteomics International, including employees (whether permanent, part time, fixed-term or temporary), contractors, consultants, suppliers, secondees and directors; anyone who is or has been an associate of Proteomics International; and anyone who is or has been a relative, dependant or spouse of any of the aforementioned persons ("Eligible Whistle blowers").



Policy on Whistleblowing

All Proteomics International employees have a responsibility to help detect, prevent and report instances of suspicious activity or wrong doing that may be illegal, unethical or improper ("**Disclosable Matter**"). You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage with your immediate manager, and serious matters will then be escalated through to senior management.

Proteomics International is committed to ensuring that all employees have a safe, reliable and confidential way of reporting any Disclosable Matters. You should report a Disclosable Matter under this Policy if you:

- have previously reported a Disclosable Matter and you are not satisfied with the response to your report; or
- feel unable to raise the Disclosable Matter with your manager, either because your manager is the subject of your report or because you have another reason to believe that your manager is unlikely to deal with the report properly.

What is a "Disclosable Matter"?

A Disclosable Matter is any concern (actual or reasonably suspected) about the following conduct, or the deliberate concealment of such conduct, for example:

- misrepresenting data
- falsifying results or reports
- financial irregularity (including a fraud against Proteomics International, a customer or supplier)
- dishonest, fraudulent or corrupt conduct
- criminal conduct
- failure to comply with any legal or regulatory obligation
- unfair or unethical dealing with a customer
- unethical or other serious improper conduct, including breaches of Proteomics International policies
- misconduct, or an improper state of affairs or circumstances
- offence against any other law of the Commonwealth that is punishable by imprisonment

A Disclosable Matter does not include grievances that only relate to the discloser's engagement, but do not have any other significant implications for Proteomics International or relate to any Disclosable Matters ("Personal Work-related Grievances"). For example, interpersonal conflicts between the discloser and another employee, or a decision to suspend or terminate the engagement of a discloser are both Personal Work-related Grievances. Personal Work-related Grievances are not protected under the Corporations Act unless it includes information about misconduct, break of employment or other law, threatened with detriment or you are seeking legal advice or representation of the whistleblower protections under the Corporations Act.

How to Report

Any report under this Policy can be made to any of the following persons via email or telephone, noting it may depend on the matter and the person who is the subject of the matter:

- to the Head of Logistics
- to the Company Secretary
- to the Chief Financial Officer
- to the Chair of the Board

While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with you about your report.

Nothing in this Policy should be taken as restricting you from reporting any matter in accordance with any relevant law, regulation or other requirement.

Action required when your Report is made





The person who you make a report to under this Policy must do the following:

- ensure that the matter is brought to the attention of the Board, or some other independent and suitably qualified person nominated by the Board for investigation
- give the Chair of the Board particulars of the report that has been made

Investigation Process

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not your concerns are substantiated, with a view to Proteomics International then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of you, anyone who is the subject of the Disclosable Matter, and any business unit concerned. The investigation will also have proper regard to the principles set out in the Australian Standard on Whistleblower Protection Programs.

Communicating with you about your Report

You will be kept informed of the outcome of the investigation arising from your report, subject to considerations of the privacy of anyone who is the subject of the Disclosable Matter and normal confidentiality requirements.

Where practicable, you will be provided with initial feedback within a week of making your report, and any further feedback on a fortnightly basis as the matter progresses.

Your Protection

The person who you make a report to under this Policy will keep your identity confidential. They will ensure that all files relating to your report are kept secure, and that information received from you is held in confidence and is only disclosed to a person not connected with the investigation if:

- you have been consulted and have consented to the disclosure, or
- it is required or permissible by law

It is possible that someone might deduce your identity without there having been a breach of confidentiality, if the nature of your report points to one particular individual having made it, or otherwise as a consequence of the nature of the investigatory process.

Proteomics International recognises that “whistleblowing” can be a very stressful and difficult thing to do. Provided that you are acting in good faith and that you have not yourself engaged in serious misconduct or illegal conduct, to the maximum extent possible you will not be subject to disciplinary sanctions by Proteomics International in relation to any matters that you report.

Proteomics International will safeguard your interests, having regard to this Policy, the Australian Standard on Whistleblower Protection Programs, and any other applicable policies and laws.

In particular, Proteomics International will take whatever action is possible consistently with this Policy to make sure that you are not personally disadvantaged for making your report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias.

If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to the Chair of the Board.

In addition, Eligible Whistle blowers qualify for protection under the Corporations Act if they have made: a disclosure in relation to a Disclosable Matter directly to an eligible recipient, to ASIC, APRA, or another Commonwealth body prescribed by regulation; a disclosure to a legal practitioner for the purposes of obtaining legal advice/ representation about the operation of the whistle bower provisions; or an emergency or public interest disclosure.

Any person found in breach of the provisions in this Policy will be subject to disciplinary procedures, up to and including the termination of your employment or engagement with Proteomics International

False Reporting

A false report of a Disclosable Matter could have significant effects on Proteomics International's

reputation and the reputations of other staff members and could also cause considerable waste of time and effort.

Any deliberately false reporting of a Disclosable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

Access

This Policy will be made available on Proteomics International's website at www.proteomics.com.au. All Employees will also be sent the most recent version of this Policy via email at least once a year.

Records

The Company Secretary will maintain a record of all whistleblowing incidents and actions taken under this Policy, so that the Policy can be periodically reviewed.

Questions

Any questions about this Policy should be directed to the Company Secretary or Managing Director.

Contact List

Chair of the Board - James Williams	M: 0409 050 519	E: j.williams@proteomicsinternational.com
Managing Director – David Morris	M: 0419 990 222	E: david@proteomics.com.au
Company Secretary and CFO - Tim Luscombe	M: 0429 707 079	E: tim.luscombe@bio101.com
Head of Product Development – Dr Pearl Tan	M: 0404 287 333	E: pearl@proteomics.com.au

Version Control

Version	Date	Changes
1	May 2019	Policy approved
2	January 2022	Updated to include November 2019 Regulatory Guidance 270
3	February 2022	Updated General Manager title and typographical error
4	January 2023	Updated to replace General Manager with Head of Logistics
5	January 2024	Include Personal Work-related grievances protection and contact details of Managing Director
6	January 2025	Update Chair and Company Secretary
7	July 2026	Update Contact List