

POLICY NAME	Whistleblower Protection Policy			
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PURPOSE

Omlie (the “Company”) is committed to maintaining a culture of trust, transparency, safety, and accountability. The purpose of this Whistleblower Protection Policy is to outline our framework for reporting concerns about conduct or activities that may be illegal, fraudulent, unethical, or otherwise inappropriate and to explain the Company’s prohibition against retaliation against anyone who reports a potential violation or concern or participates in an investigation of a violation or concern.

SCOPE

This policy applies to all Omlie employees, consultants, contractors and any other parties with which Omlie conducts business, regardless of location.

GUIDING PRINCIPLES

- Omlie expressly prohibits corporate conduct that is illegal, unethical, or fraudulent. The primary objective of this policy is to support an ethical culture in which any and all parties are comfortable raising concerns and asking tough questions without fear of retaliation.
- The Company expects that, if any stakeholder sees something of concern, has a question or is unsure how to act consistent with our Company’s values, they will speak up and let the concern be known by the right parties.
- Any concern or question raised in good faith will be addressed properly and fairly and in a timely manner.
- The Company will maintain the confidentiality of complaints, investigations and corrective action taken to the extent possible and except as may be reasonably necessary under the circumstances to facilitate an investigation, take remedial action, or comply with applicable law.
- Omlie offers mechanisms for people to raise concerns either anonymously, or not. Please see the information described below about our reporting channels.
- Retaliation is prohibited. The Company strictly prohibits any form of retaliation against individuals who raise good faith concerns about conduct or activities that may be illegal, unethical, fraudulent, or otherwise inappropriate or participate in related investigations. Violation of our prohibition of retaliation will not be tolerated and will be grounds for disciplinary action by the Company, up to and including termination of employment or working relationship with Omlie.
- Whenever necessary, the Company will undertake appropriate corrective or disciplinary action for violations of any Omlie policy including but not limited to policies set forth in the Employee Handbook as well as violations of applicable laws or regulations.
- The Company will comply with applicable whistleblower laws and regulations in reviewing and resolving any concerns or complaints that are raised.

REPORTING CHANNELS

Omlie provides two options for reporting concerns about corporate conduct that is illegal, unethical, fraudulent, or otherwise inappropriate:

1. Employees, consultants, contractors and any other parties with which Omlie conducts business may report concerns directly to any member of Omlie's senior management team.
2. In addition, the Company provides a secure, accessible and confidential way for person(s) to report a concern via the following website
 - a. <https://omlie.surveyparrot.com/s/report-a-concern/tt-e4GQ8>

The reporting form includes a section to describe the concern in detail and offers an optional field to include an email address for follow-up, if desired. By providing an email address, the Ethics Committee (described below) will be able to follow-up directly sharing updates or asking for clarifications as necessary.

All reports, whether they are anonymously submitted or not, will be securely sent to the Ethics Committee for follow-up investigation.

In addition to the Omlie-hosted channel noted above, federal agencies, such as the U.S. Department of Justice and the Securities and Exchange Commission, have formal whistleblower programs and mechanisms through which individuals may file a report, should that be appropriate.

INVESTIGATION PROCESS

ETHICS COMMITTEE

The Omlie Ethics Committee has principal responsibility for investigating internal complaints or questions that raise ethical or legal concerns. The Ethics Committee is comprised of the Company CEO and HR lead, and shall include cooperation with any representatives of specific business functions related to the issue.

Upon receipt of a new concern, the Ethics Committee will contact the person who raised the matter, if not reported anonymously, and to the extent possible, will keep the person informed on the progress of the investigation including its resolution, taking into consideration privacy and confidentiality requirements.

The Ethics Committee has the authority to include or assign additional investigators from outside of the Committee. For example, the Ethics Committee may seek additional subject matter expertise or assistance based on the scope of the concern raised. The Ethics Committee is also responsible for overseeing the implementation of any corrective action(s) resulting from the investigation.

CONFIDENTIALITY AND CONSENT

Omlie is committed to maintaining confidentiality throughout the investigatory process, consistent with the need to conduct a thorough investigation. Information about the concern will only be shared on a

need-to-know basis, with a default of “confidential – not to be shared.” Any violation or breach of confidentiality may result in:

- Disciplinary action for the investigator or Company representative responsible for the confidentiality breach.
- Immediate corrective measures to mitigate the impact of the breach and begin the process of restoring trust for all parties involved.

In some cases, the Company may be required to disclose the complaint or violation to the appropriate authorities, in accordance with applicable law.

The Company CEO and HR Lead are responsible for enforcement and oversight of this policy, and any violation of this policy, or the whistleblower protections outlined within, will be addressed as soon as possible.

OTHER CONSIDERATIONS

CLIENT SCREENING

Omlie is a mission-driven company, built around its core values. The Company maintains the right to end any client or vendor relationship if any stakeholder is not meeting our high ethical standards and treating people with respect. When the Company is pursuing new client engagements, it is expected that a member of the Company will appropriately screen the client organization and recipient of our services to uncover any potential issues of concern, which may include, but are not limited to, the following areas:

- Poor environmental standards
- Inadequate treatment of employees, contractors or other partners
- Other industry-related negative impacts of doing business
- Lack of attention to compliance, financial or legal concerns

Remember, Omlie cannot remedy corporate conduct that is illegal, unethical, fraudulent, or retaliatory unless such conduct is brought to its attention. You should not hesitate to report any conduct which you believe violates this policy.

Compliance with this policy is a condition of employment or, in the case of non-employees, of working with Omlie. You are encouraged to raise any questions or concerns about this policy or about possible violations in accordance with the reporting channels described above.

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