

## WHISTLEBLOWER POLICY

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### 1 PURPOSE

Sienna Cancer Diagnostics Limited (“Sienna” or “the Company”) is committed to promoting and maintaining an open working environment where instances of Improper Conduct can be reported without fear of intimidation or reprisal. This policy provides a framework for reporting and investigating Improper Conduct.

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### 2 SCOPE

This policy details the process for directors, officers, employees, contractors (and the employees of contractors), consultants and any person dealing with Sienna in any capacity to report Improper Conduct.

There is an expectation that directors, officers, employees and contractors who witness Improper Conduct will report it as soon as practicable using the procedures set out in this policy.

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### 3 DEFINITIONS

**Improper Conduct** is defined as:

- an unsafe work practise or breach of OH&S regulations;
- dishonest, fraudulent, corrupt or unlawful conduct or practices;
- misleading or deceptive conduct including conduct or representations which amount to improper or misleading accounting or financial reporting practices;
- conduct or any proposed conduct, bid, proposal, offer, contract, product or other aspect of Sienna business that breaches the provisions of any legislation in Australia (Commonwealth or State) or other countries in which Sienna does business;
- harassment, coercion or discrimination;
- a breach of Sienna’s policies;
- conduct within Sienna’s control which is a significant danger to the environment;
- conduct endangering the health and safety of any person or persons;
- any action taken against, or harm suffered by, a person as a result of making a report under this Policy;
- any other conduct or act which may cause loss to Sienna or which may otherwise be detrimental to its interests.

#### **Whistleblower**

Any person dealing with Sienna in any capacity, whether an employee, director, officer, contractor, contractors’ employee, or consultant who whether anonymously or not, makes or attempts to make a disclosure of Improper Conduct.

#### **Protected Disclosure**

Any good faith communication based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence Improper Conduct.

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## 4 REPORTING A PROTECTED DISCLOSURE

A person seeking to make a Protected Disclosure is required to:

- Have reasonable grounds to suspect that the information concerns Improper Conduct in conducting Sienna business. The information must be:
  - factually accurate, and
  - from first-hand knowledge
- Make the disclosure in good faith. The disclosure must be honest and genuine, and motivated by wanting to disclose Improper Conduct. The disclosure will not be considered 'in good faith' if the Whistleblower has any unrelated reason for making the disclosure.

It is not the reporting person's job to investigate or prove a case of Improper Conduct.

A person who has committed or been involved in Improper Conduct themselves, will not be immune from disciplinary action merely because they have reported the Improper Conduct in accordance with this policy. However, the person's conduct in making the report is likely to be taken into account in determining what disciplinary action is appropriate.

Any reports, concerns or queries regarding Improper Conduct should be discussed or raised with the Company Secretary or if the Company Secretary is implicated, one of the following:

- the Chief Executive Officer (CEO),
- a member of Sienna's Audit and Risk Committee,
- the chair of the board.

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## 5 INVESTIGATION OF REPORTS OF IMPROPER CONDUCT

All reports of Improper Conduct will be allocated to an appropriately qualified person to conduct a thorough investigation of the report. In appropriate circumstances an external investigator may be appointed.

Only those that are considered impartial will be asked to investigate a matter. Where a report of Improper Conduct involves the Chief Executive Officer, the matter will be directed to the Board for investigation.

At the end of the investigation, a report of the findings will be handed to a member of the Audit and Risk Committee. The committee will determine the appropriate response or actions. The CEO (or the Chairperson where appropriate) is responsible for the implementation of any resulting actions. Where allegations of Improper Conduct cannot be substantiated, that person implicated will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

The Whistleblower will be informed of the findings of the investigation and the resulting response or actions to the fullest extent possible within commercial, legal and confidentiality constraints. If the report was made anonymously, the Audit Committee will decide whether the findings should be communicated and to whom. If it is considered appropriate, the committee will determine the method of communication.

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## 6 CONFIDENTIALITY

If a report of Improper Conduct is made, the Company will endeavour to ensure the identity of the Whistleblower is protected.

The Whistleblower's identity will not be disclosed unless the:

- person making the report consents to the disclosure;
- disclosure is required by law;
- disclosure is necessary to prevent or lessen a serious threat to a person's health or safety;
- disclosure is necessary to protect or enforce Sienna's legal rights or interests, or to defend itself against any claims.

The Company will also ensure that any records relating to a report of Improper Conduct are stored securely and are able to be accessed only by authorised employees.

The following will not be tolerated:

- unauthorised disclosure of the identity of a person who has made a report of Improper Conduct, or
- unauthorised disclosure of information from which the identity of the reporting person could be inferred, or
- any reprisals, discrimination, harassment, intimidation, or victimisation against any person suspected of making a report of Improper Conduct, or against that person's colleagues, employer (if a contractor) or relatives.

Directors, officers or employees engaging in such conduct will face disciplinary action including in serious cases, dismissal. Where contractors or consultants are involved, the contracts underlying their relationship with Sienna may be terminated. If the conduct involves a breach of law or regulation, the matter may also be referred to an appropriate law enforcement authority for consideration.

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## **7    REVIEWS**

This policy will be reviewed periodically to ensure that it remains consistent with the board and management's commitment to the reporting and investigation of Improper Conduct.