COMPLIANCE

Whistleblower Policy

Policy Owner: Paul Jones

Version: 1.0

Effective Date: 2026-02-24

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1. Purpose

Crystal Project Inc. (“Crystal”) is committed to lawful and ethical conduct in all aspects of its operations. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Crystal can address and correct inappropriate conduct and actions. The policy provides a safe and confidential channel for reporting and protects individuals who report in good faith from retaliation.

2. Scope

This policy applies to:

- All employees of Crystal Project Inc.
- Contractors and consultants
- Any other person who wishes to report a concern about Crystal’s conduct, operations, or compliance

Concerns may relate to conduct occurring at work, in connection with Crystal’s business, or that otherwise affects Crystal’s operations, reputation, or legal compliance.

3. What to Report

You are encouraged to report concerns about:

- Violations of Crystal’s Code of Conduct or code of ethics
- Suspected violations of law or regulations that govern our operations

- Suspected fraud, financial misconduct, or misuse of company resources
- Discrimination, harassment, or other workplace misconduct
- Safety or environmental concerns
- Modern slavery, human rights, or other serious ethical concerns
- Any other conduct that you believe in good faith is wrongful, illegal, or inconsistent with Crystal's policies or values

You do not need to have proof that a violation has occurred. A good-faith belief or reasonable suspicion is sufficient to make a report.

4. Reporting Channels

Internal reporting

You may raise concerns with your manager, People/HR, leadership, or another trusted point of contact. Crystal will treat reports seriously and, where appropriate, investigate and take corrective action.

Anonymous reporting (whistleblower channel)

For those who prefer to report anonymously, Crystal provides an **Anonymous Whistleblower Channel** via a confidential form. Reports submitted through this channel are handled in accordance with this policy.

Anonymous Whistleblower Channel: Submit a report anonymously

You may choose whether to provide your contact details or to remain fully anonymous. Crystal does not track or store identifying information unless you voluntarily provide it. Never submit passwords or other sensitive personal credentials through the form.

5. Non-Retaliation

It is contrary to Crystal's values for anyone to retaliate against an employee or other person who, in good faith, reports an ethics violation, a suspected violation of law, or other concern covered by this policy.

- **No retaliation:** No one may retaliate, harass, intimidate, or take adverse action against a person for making a good-faith report or for participating in an investigation. Retaliation includes termination, demotion, suspension, discrimination, harassment, or any other form of detriment.
- **Discipline for retaliation:** An employee who retaliates against someone who has reported a violation in good faith may be subject to discipline up to and including termination of employment.
- **Good faith:** This policy protects individuals who report in good faith. It does not protect individuals who make knowingly false or malicious reports. False or malicious reporting may result in disciplinary or other appropriate action.

6. Handling of Reports

Reports received through the whistleblower channel or other channels will be:

- Treated confidentially to the extent possible consistent with a fair investigation and legal obligations
- Reviewed by appropriate personnel (e.g. leadership, People/HR, or designated compliance contact)
- Investigated where warranted, in a timely and proportionate manner
- Acted upon as appropriate (e.g. corrective action, discipline, referral to authorities)

Crystal will not disclose the identity of a reporter without consent unless required by law or necessary to conduct a fair investigation. Where you have provided contact details, Crystal may follow up to request additional information.

7. External Reporting

Nothing in this policy prevents you from reporting concerns to a regulator, law enforcement, or other external body where you have a right or obligation to do so under applicable law. In some jurisdictions, whistleblowers may have additional protections or reporting avenues under law.

8. Policy Review

This policy is reviewed periodically and may be updated to reflect changes in law, best practice, or Crystal's operations. The Policy Owner is responsible for maintaining and reviewing this policy.

9. Related Documents

- **Code of Conduct** — Expected standards of behaviour
- **Modern Slavery and Human Trafficking Policy** — Human rights and supply chain

Questions about this policy or how to report a concern may be directed to leadership or security@crystal-knows.com.