



WELLSTAR Human Rights Policy

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1. Overview

WELLSTAR Technologies Corp. (“**WELLSTAR**”) is committed to providing a global working environment that is free of any form of harassment or discrimination based on the grounds enumerated under provincial, federal, state or other Human Rights legislation and guiding principles, including the UN Guiding Principles on Business and Human Rights (“**Human Rights**”). WELLSTAR respects the dignity of every person. WELLSTAR is firmly committed to providing equal opportunities in the workplace to enable every person to contribute fully. WELLSTAR also values the protection of human rights within the communities in which WELLSTAR operates.

This Human Rights Policy (the “**Policy**”) outlines how WELLSTAR, supported by People & Culture, will strive to maintain a respectful, professional, inclusive, and psychologically safe workplace.

2. Purpose

The purpose of this Policy is to provide guidance and establish expectations for behaviour in the workplace as it relates to an individual’s basic and fundamental right to be free from harassment and discrimination. It is also intended to be guide for directors, officers, employees, contractors, consultants, temporary workers, volunteers, individuals providing or delivering health care or health related services, and other persons acting for or on behalf of WELLSTAR (“**Personnel**”) to know that WELLSTAR will uphold Human Rights in the Workplace and is committed to upholding Human Rights in its interactions with customers and suppliers.

3. Definitions

The following definitions are to serve as a guide for some of the words or phrases that could otherwise be left up to interpretation.

“**Discrimination**” means any practice or behaviour, whether intentional or not, which has a negative effect on an individual or group based on prohibited grounds (for example, race, ethnicity, political affiliation, religion, gender, sexual orientation, age, marital and family status or disability) unrelated to a person’s abilities. Discrimination may arise as a result of direct, indirect, differential or unequal treatment of an individual or group of individuals.

“**Harassment**” means improper comment or conduct that a person knows or ought to know would be unwelcome, offensive, embarrassing or hurtful.

“**Workplace**” is defined broadly to mean any location in which WELLSTAR related work or interactions take place, including (but not limited to) the following:

- Corporate office, clinic and other work sites of WELLSTAR, including washrooms, vehicles, digital locations, and any other location where WELLSTAR related work is being conducted
- Places where employees or others have gathered as a result of WELLSTAR related responsibilities
- Attendance at WELLSTAR sponsored conference, training or social event
- All virtual and remote environments where WELLSTAR Personnel interact with each other, customers and suppliers.

4. Scope

It is the Personnel's responsibility to maintain a Workplace that reflects respect for Human Rights and is free from all Discrimination and Harassment. As such, this Policy applies at every level of the organization to all Personnel, as well as independent service providers, clients and visitors while attending a WELLSTAR Workplace.

People & Culture will support the application of this Policy throughout the employment relationship, including recruitment, hiring, onboarding, compensation, development, promotion, accommodation, performance management, and termination.

This Policy applies when WELLSTAR is purchasing the services of others and when WELLSTAR is the provider of the services. When working with service providers, WELLSTAR encourages them to uphold these principles and urge them to adopt similar policies within their own business. For WELLSTAR Personnel, this Policy applies to every stage of the Workplace relationship (for example, recruitment, selection, compensation, training, promotion and termination).

This policy should be read in conjunction with the following WELLSTAR policies and guidelines:

- WELLSTAR Acceptable Use Policy
- WELLSTAR Whistleblower Policy
- WELLSTAR Employee Handbook
- WELLSTAR Code of Business Conduct and Ethics
- WELLSTAR Workplace Violence, Discrimination, Bullying and Harassment Policy

Where this policy conflicts with another WELLSTAR policy, this Policy takes precedence.

5. Roles and Responsibilities

ROLE	RESPONSIBILITIES
WELLSTAR Chief Executive Officer (CEO)	• Owns and updates this Policy, as required, every two years or in response to material legal/regulatory changes. • Support the escalation and oversight of significant human rights concerns, as appropriate • Approve any documented exceptions to this Policy
WELLSTAR Legal	• Provide legal guidance on the interpretation and application of this Policy
Managers and People Leaders	• Foster a respectful, inclusive, and discrimination-free workplace • Respond promptly to observed or reported concerns and escalate them to People & Culture, Legal, or another appropriate function • Support accommodation requests and related workplace measures • Cooperate with investigations and implement required corrective actions
Personnel	• Treat others with dignity and comply with this Policy and applicable human rights requirements • Refrain from discrimination, harassment, retaliation, or other conduct that infringes Human Rights • Promptly report suspected or actual violations through an available reporting channel • Cooperate with accommodation processes, investigations, and corrective measures

6. Policy

WELLSTAR will not tolerate, condone or ignore any conduct that is discriminatory or harassing or otherwise compromises an individual's Human Rights. Such practices are contrary to WELLSTAR's core values, as well as a violation of the law.

WELLSTAR strives to maintain a culture of understanding and mutual respect for the dignity of each person in the Workplace, so that each person feels a valued part of WELLSTAR.

WELLSTAR will seek to prevent or mitigate adverse Human Rights impacts that are linked to its operations, products, or services, even if WELLSTAR has not directly contributed to those impacts.

WELLSTAR respects all persons, including employees, contractors and service provider's right to collective bargaining, equal remuneration, and right to non-discrimination.

7. International Application

WELLSTAR is committed to prevent human trafficking, forced labour, child labour in its operations, and will only select service providers or partners who are committed to preventing such practices.

WELLSTAR will make best efforts to abide by the legislation pertaining to Human Rights in the jurisdictions where WELLSTAR operates. Where national and international human rights standards differ, WELLSTAR will follow the higher standard. Where they are in conflict, WELLSTAR will adhere to national law while seeking ways to respect international human rights to the greatest extent possible.

8. Respect for Human Rights

Personnel must uphold this Policy and:

- Respect the dignity and Human Rights of others at all times.
- Support inclusive workplace practices and People & Culture programs that promote equal opportunity, belonging, and respect.
- Listen to, consider and learn from others' views and experiences in the course of their work.
- Actively identify and assess workplace practices that may discriminate, impose unfair burdens, or deny benefits to an individual or group, including practices that appear neutral, and take steps to correct or report them.
- Help maintain a physically and psychologically safe and healthy workplace for everyone.
- Respect WELLSTAR clients' privacy and protect their personal information in accordance with applicable privacy laws.
- Refrain from abusive, threatening, or harassing behaviour, including offensive remarks and unwelcome sexual advances or attention.

- Report suspected or actual violations of this Policy to their manager, including discrimination or harassment they have witnessed or experienced. Reports may also be made through the process outlined in the *Whistleblower Policy*.
- Cooperate fully with investigations into harassment or discrimination complaints.

9. Complaints

WELLSTAR takes complaints seriously and may investigate a complaint formally or informally, depending upon the circumstances. Steps will be taken based on the findings of the investigation, applicable Human Rights law and Policy to address the complaint and prevent future occurrences.

10. Anti-Retaliation

No reprisal or retaliatory action will be taken against any employee for raising concerns under this Policy.

11. Accommodation

An individual with restrictions or limitations resulting from an enumerated ground under applicable Human Rights law may have the right to be accommodated short of undue hardship and is encouraged to speak to their manager or People & Culture to discuss an appropriate accommodation.

12. Compliance

Personnel must comply with all aspects of this Policy and support others in doing so. Personnel are responsible for promptly reporting a suspected or actual violation of this Policy, without fear of reprisal, to their manager or People & Culture so that it can be appropriately investigated, addressed and handled. Managers and supervisors have the responsibility to foster an environment where concerns can be immediately shared and to act immediately on observations or allegations of harassment or discrimination.

Personnel who fail to comply with this Policy may be subject to disciplinary action, up to and including termination of employment. Consequences may also include an apology, education such as mandatory sensitivity training, counselling, reprimands, suspension, or other sanctions dictated by law.

13. Related Documentation

002-POL WELLSTAR Acceptable Use Policy
 WELLSTAR Whistleblower Policy
 WELLSTAR Employee Handbook
 WELLSTAR Code of Business Conduct and Ethics
 WELLSTAR Workplace Violence, Discrimination, Bullying and Harassment Policy

14. Compliance

14.1. Non-Compliance with this Policy

Non-compliance with this Policy is subject to disciplinary action, up to and including termination of employment and/or contract, as well as any other remedies as legally applicable depending on jurisdiction, context, and local regulatory requirements.

14.2. Exceptions to this Policy

ALL exceptions to this Policy must be documented and approved by Legal. Exceptions must be reviewed annually at a minimum.

15. Revision

This Policy must be reviewed annually and whenever material legal, regulatory, or market changes occur. It will be republished only when amendments are made.