



Whistleblower Policy

Table of Contents

1. Purpose and Principles.....	3
2. Scope and Application	3
3. Definitions.....	3
4. Roles and Responsibilities.....	3
5. When to Report	4
6. How to Report.....	4
7. Anonymity & Confidentiality	5
8. Investigating Reports	5
9. Protection from Retaliation	5
10. Retention of Reports.....	6
11. False Reporting	6
12. Related Documentation.....	6
12.1. Related Policies	6
13. Compliance	6
13.1. Non-Compliance with this Policy	6
13.2. Exceptions to this Policy	6
14. Revision History	6

1. Purpose and Principles

WELLSTAR Technologies Corp. (“**WELLSTAR**”) encourages open communication and is committed to protecting individuals who report concerns in good faith. This Whistleblower Policy (the “**Policy**”) establishes WELLSTAR’s framework that outlines roles and responsibilities, processes for reporting and investigation, and commitment to protection from any form of retaliation. As stated in the *Code of Business Conduct and Ethics*, WELLSTAR, is committed to the highest standards of legal and ethical business conduct.

This Policy supports WELLSTAR’s commitment to integrity, accountability, transparency, and compliance. It establishes a safe, secure, and confidential framework for employees, contractors, consultants, vendors, and other stakeholders to report concerns about misconduct, unethical behaviour, legal violations, or breaches of company policy.

2. Scope and Application

This Policy applies to all individuals defined as “**Protected Persons**”, which includes patients, investors, directors, officers, employees, contractors, consultants, vendors, and other third parties who interact with WELLSTAR.

3. Definitions

“**Protected**” refers to the commitment to protect anonymity and protection from retaliation as described in this Policy.

“**Protected Persons**” as defined by WELLSTAR includes any of the following who have observed an inappropriate behaviour and wish to make a complaint: patients, investors, directors, officers, employees, contractors, consultants, vendors, and other third parties who interact with WELLSTAR.

4. Roles and Responsibilities

ROLE	RESPONSIBILITIES
Protected Persons	• Report concerns in good faith • Cooperate with investigations, whether reporting anonymously or on an identified basis
WELLSTAR Management: Chief Executive Officer (CEO) and Chief Financial Officer (CFO)	• Receive whistleblower reports and ensure timely acknowledgement • Ensure each is investigated and resolved as appropriate • Preserve confidentiality and anonymity • Escalate material matters to the Board • Report quarterly to the Audit and Risk Committee • Maintain this Policy annually
WELL Health Chief Legal Officer (CLO)	• Receives whistleblower reports and ensures timely acknowledgement on behalf of the WELLSTAR CEO and CFO • Advises on legal or regulatory nature of complaints • Prepares quarterly reporting to the Audit and Risk Committee on themes, volumes, and status of whistleblower reports

WELL Health Chief People Officer (CPO)	• Receives whistleblower reports and ensures timely acknowledgement on behalf of the WELLSTAR CEO and CFO; • Advises on disciplinary actions where necessary • Collaborates with WELLSTAR management to communicate this Policy across WELLSTAR on an annual basis • Facilitates training and awareness of this Policy and the Whistleblower Processes across WELLSTAR on an annual basis
Designated Investigators	• As designated by WELLSTAR Management, responsible to investigate reports on behalf of the Management
Audit and Risk Committee	• Oversees whistleblower activity including volumes, themes, status and corrective actions • Oversees any report involving the CEO, CFO or WELLSTAR Officers
WELLSTAR Board of Directors	• Approves changes to this Policy • Receives reports material to WELLSTAR

5. When to Report

All Protected Persons are encouraged to report, in good faith, any information they believe relates to illegal practices, inappropriate behaviours, or any violations of a WELLSTAR Policy. Whistleblower reports may include, but are not limited to:

- Financial fraud or misreporting
- Breach of confidentiality and/or privacy (especially as it relates to patient data)
- Bribery, corruption or kickbacks
- Theft, embezzlement, or misappropriation
- Workplace harassment, discrimination, or retaliation
- Health and safety violations
- Environmental misconduct
- Breach of laws, regulations, or internal policies
- Conflicts of interest
- Abuse of authority
- Theft, misuse or abuse of WELLSTAR property
- Retaliation or retribution against a Protected Person who submits a whistleblower report

For clarity, reporting should include actual or suspected illegal, unethical, improper, unsafe, or inappropriate conduct, including conduct that may not be expressly addressed in a specific WELLSTAR Policy but is inconsistent with WELLSTAR's legal, ethical, professional, business standards or *Code of Business Conduct and Ethics*.

6. How to Report

To provide a safe and accessible channel for reporting concerns, WELLSTAR has implemented a confidential and independent reporting platform managed by Navex, a third-party provider of compliance program solutions.

A Protected Person may confidentially report concerns 24/7, via the following methods:

1) Online Whistleblower Portal

Visit: well.ethicspoint.com or wellmobile.ethicspoint.com
Languages and live operators are available depending on jurisdiction.

2) Phone

Canada: 1-833-730-3733

USA: 1-833-730-3742

A Protected Person may also report concerns directly, by e-mail or in writing, to the WELLSTAR CEO or Chair of the Audit and Risk Committee, as an alternative to the Navex platform.

Nothing in this Policy prevents a Protected Person from reporting suspected wrongdoing or misconduct to the British Columbia Securities Commission, a self-regulatory organization or law enforcement agency.

7. Anonymity & Confidentiality

All reports will be taken seriously, and WELLSTAR empowers and supports the use of any method for whistleblower anonymous reporting. WELLSTAR recognizes that anonymity is important for individuals who may fear retaliation or other consequences.

WELLSTAR also recognizes that providing context details may enhance WELLSTAR's ability to investigate and resolve effectively. However, reports submitted should not include any personal information, personal health information, patient information, or other sensitive information unless absolutely necessary to describe the concern.

All reports will be handled with strict confidentiality and are accessible only to authorized members and/or designated investigators, except as required by law, applicable regulatory authorities or a court of competent jurisdiction. Any personal data collected will be processed in accordance with applicable privacy and whistleblower protection laws.

8. Investigating Reports

All whistleblower reports will be investigated by WELLSTAR. An investigation of any matter brought to WELLSTAR's attention as a result of these procedures will not in any way be, or be deemed to be, a determination that any actions or inactions that are the subject of the report have in fact occurred or are improper.

9. Protection from Retaliation

WELLSTAR prohibits retaliation, intimidation, harassment, threats, discipline, dismissal, demotion, discrimination, or any other adverse action against a Protected Person based upon any lawful action taken by or on behalf of that Protected Person: (i) with respect to the good faith reporting of complaints or concerns under this Policy, seeking advice with respect to such reporting, or indicating a good faith intent to make such a report; (ii) in cooperating with or participating in an internal investigation of a report pursuant to these procedures; (iii) in providing information, causing information to be provided, or otherwise assisting in an investigation regarding any conduct which the Protected Person reasonably believes constitutes criminal conduct or a violation of applicable laws, where the information or assistance is provided to or the investigation is conducted by a regulatory, legislative or law enforcement authority; (iv) in filing, causing to be filed, testifying, participating in, or otherwise assisting in a proceeding filed or about to be filed relating to alleged criminal

conduct or an alleged violation of applicable law; or (v) in otherwise assisting with a matter in accordance with this Policy.

Any Protected Person who believes they are the subject of any form of retaliation for submitting a whistleblower report or cooperating in a related investigation should immediately submit a report via the methods outlined above.

Any individual within WELLSTAR who retaliates against any Protected Person who has made a whistleblower report in good faith, or who has cooperated in a related investigation, will be subject to discipline, up to and including termination of employment or contractor status.

10. Retention of Reports

WELLSTAR will retain records of whistleblower reports made under this Policy (including any reprisals as required by applicable law), tracking their receipt, investigation, and resolution, for a period of at least six years.

11. False Reporting

Deliberately making a false or malicious report, which is not done in good faith, will be viewed as a serious disciplinary offence and may result in disciplinary action up to and including termination of employment or contractor status.

12. Related Documentation

12.1. Related Policies

WELLSTAR Whistleblower Procedure
WELLSTAR Code of Business Conduct and Ethics

13. Compliance

13.1. 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.

13.2. Exceptions to this Policy

ALL exceptions to this Policy must be documented and approved by the WELL Health CLO. Exceptions must be reviewed annually at a minimum.

No provision contained in this Policy is intended to give rise to civil liability to shareholders, competitors, employees, or other persons, or to any other liability against WELLSTAR.

14. Revision History

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

Ver.	Date	Editor(s)	Approver(s) /Owner(s)	Summary of Change(s)	Format
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1.0	Sept 25, 2026	Jennifer Stearns, Gila Pyke	Darren Hoegler	Initial version	Electronic
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