Inventprise Unventprise Whistleblower Policy

Introduction

The reputation and integrity of Inventprise, Inc. (the "Company", "we", "our") are vital to our success. Therefore, at Inventprise, any worker or business partner may submit good faith reports and complaints regarding any legal, regulatory or policy matter without fear of dismissal or retaliation of any kind.

Purpose

This Whistleblower Policy ('Policy') outlines the responsibilities and procedures at Inventprise for managing the receipt, retention, and treatment of reports, complaints, questions and concerns (collectively, 'Reports') regarding any legal, regulatory, or policy matter. It also explains the methods for submitting such Reports to Inventprise on a confidential and/or anonymous basis and the protections afforded to individuals who submit Reports in good faith.

Scope

This Policy applies to all employees (whether full time, part time, permanent, temporary and/or fixed term), directors, officers, contractors, consultants, volunteers, and interns of Inventprise and its affiliates and subsidiaries worldwide (collectively, '*Inventprise*'). This Policy refers to these individuals collectively as 'we,' 'us' or 'workers.' All Inventprise workers must comply with this Policy. Workers at third-party business partners (such as suppliers of goods and services) who are working with Inventprise or on behalf of Inventprise (collectively, '*business partners*') must also comply with this Policy.

This Policy applies to Reports relating to any of the following issues, without limitation:

- 1. Questionable accounting or auditing matters
- 2. Misrepresentations or false statements to management, regulators, external auditors or others by an Inventprise senior officer, accountant or other employee regarding a matter contained in Inventprise financial statement or records, audit reports or other disclosures
- 3. Corruption or bribery
- 4. Non-compliance with clinical trial standards
- 5. Violations of environmental, health and safety standards
- 6. Inappropriate disclosure or handling of confidential information of Inventprise or others
- 7. Embezzlement, theft or improper use of equipment, assets or resources
- 8. Falsification of contracts, reports or records
- 9. Discrimination or harassment
- 10. Misconduct or inappropriate behavior
- 11. Sabotage or vandalism
- 12. Violence or threats
- 13. Breaches of contracts or licenses
- 14. Any violation of applicable laws, regulations and policies relating to Inventprise business or operations, including the Inventprise code of business conduct and ethics
- 15. Any potential retaliation for reporting any of the above

If you have questions about this Policy or other compliance and ethics topics, please contact the Inventorise HR Team.

Inventprise Unistleblower Policy

1. Whistleblower Policy

Consistent with our values, Inventprise expects all Inventprise workers and business partners to report potential violations of laws, regulations and policies promptly and in good faith, without fear of dismissal or retaliation, so that the matter may be appropriately investigated and addressed. Individuals other than workers and business partners are also strongly encouraged to report such matters.

1.1 Reporting Potential Violations

If you have witnessed or been informed about any potential violation of applicable laws, regulations or policies, you should promptly report the facts of the matter using one of the methods described below in Section 1.2. These are the individuals authorized by this Policy to receive and act upon Reports on behalf of Inventprise. It is important that all potential violations of applicable laws, regulations and policies are brought to the attention of Inventprise promptly so that the matter can be appropriately investigated and addressed.

1.2 How to Submit a Report

Anyone may submit Reports regarding any legal, regulatory, or policy matter relating to Inventprise's business and operations, including matters relating to Inventprise's accounting, internal controls and auditing practices, using any of the following methods:

- Contact your manager or supervisor (business partners may contact their Inventprise
 point of contact). Managers, supervisors and points of contact who receive Reports are
 obligated to promptly contact appropriate Inventprise Human Resources or Legal
 personnel and share all relevant information.
- Contact the following HR and Legal personnel directly (or their successors if these individuals are no longer in these roles):

HR Contact: Rachael Moss, Chief People Officer

rmoss@inventprise.com

Legal Contact: Kelsey O'Neal, Senior Legal Associate

koneal@Inventprise.com

1.3 Making an Anonymous Report

You are not required to report a matter to anyone who you believe is involved in the matter. If you do not want to report the matter to the HR or Legal personnel listed above, you may instead contact the confidential number or email below on an anonymous basis. The Inventprise Whistleblower Hotline, which is staffed by an outside vendor and can be contacted anonymously. The outside vendor summarizes all Reports received and forwards them promptly to appropriate Inventprise Legal personnel. You can contact the Whistleblower Hotline from any computer or phone as follows:

1. Toll-Free Telephone (U.S. & Canada):

- English speaking U.S. and Canada: (877) 851-2352
- Spanish speaking U.S. and Canada: 800-216-1288
- 2. E-mail: reports@lighthouse-services.com (must include company name with report)
- 3. Online Report: https://report.syntrio.com/inventprise

If you make a Report, please keep it factual and avoid speculating or making conclusions. The Report should contain as much specific information as possible to allow Inventorise to



adequately assess the nature, extent, and urgency of the matter, and to perform an appropriate investigation.

2. Treatment of Reports

Upon receipt of a Report, Inventprise Human Resources or Legal personnel will, when possible, acknowledge receipt of the Report from the individual making the Report. Individuals submitting a Report through the Inventprise Whistleblower Hotline will receive a Report Key from the vendor, which permits the Reporter to review follow-up questions, submit more information or receive status updates (if available) from Inventprise about the Report.

Inventprise will promptly review and investigate Reports relating to accounting, internal accounting controls and auditing matters. We will resolve all reports, whether submitted internally or through the Inventprise Whistleblower Hotline, within 30 days of receipt.

2.1 Investigation of Reports

Inventprise will treat all Reports with sensitivity and discretion and will promptly investigate all Reports describing potential violations of applicable laws, regulations or policies that it believes were made in good faith. All information disclosed during the course of an investigation will remain confidential, except as necessary to conduct the investigation and take remedial action in accordance with applicable laws. All Inventprise workers and business partners have a duty to cooperate with investigations. Failing to cooperate or deliberately providing false or misleading information is grounds for disciplinary action, including termination of employment or contractual relationships.

2.2 Actions Resulting from Reports

At the conclusion of its investigation and any disciplinary process, if Inventprise determines that a violation of applicable laws, regulations or policies has occurred, it will take appropriate remedial action commensurate with the severity of the offense. This action may include disciplinary action against the workers or business partners involved, including but not limited to dismissal, termination of employment or contractual relationships, reassignment, changes in reporting relationships, training or other measures Inventprise deems appropriate under the circumstances. Inventprise may also contact appropriate legal authorities and/or regulatory bodies when legally required or when Inventprise otherwise deems it advisable. Inventprise might also conclude that no violation of laws, regulations or policies has occurred or that it is unable to make a conclusive determination.

2.3 Records Management and Sharing of Reports

Inventprise will maintain appropriate records of all Reports, tracking their receipt, investigation and resolution, consistent with its records management policies.

3. Anti-Retaliation Policy: Whistleblowers are Protected

Inventprise is committed to a workplace where good faith reports, complaints, questions and concerns regarding potential violations of applicable laws and regulations can be submitted without fear of retaliation. Inventprise complies with applicable laws protecting workers against unlawful retaliation and will not tolerate intimidation or retaliation against workers or business partners.

All workers and business partners who experience, witness or are informed of any conduct they believe may be retaliatory must promptly report the potential retaliation using any of the methods described above in Section 1.2-1.3.

4. Communication of Policy to Workers and Business Partners

This Policy shall be shared with all workers on the Inventprise intranet and shall also be posted on the

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Company's public website.

5. References

Inventprise strongly encourages all workers and business partners to ask questions about this Policy. To do so, you may contact any of the following:

- **1.** Send an email to HR@Inventprise.com. This inbox is monitored by Inventprise personnel trained and authorized to answer questions about this Policy.
- 2. Contact any of the following HR or Financial personnel directly (or their successors if these individuals are no longer in these roles):
 - Rachael Moss, Chief People Officer, rmoss@Inventprise.com
 - Jeff Wilson, Chief Financial Officer, jwilson@Inventprise.com
 - Kelsey O'Neal, Senior Legal Associate, koneal@inventprise.com