



WHISTLEBLOWING POLICY

May 2023

Scope

All Employees are required to comply with applicable whistleblowing laws and with the whistleblowing provisions set out in the Company's Code of Business Conduct and Ethics (the "Code"). This Policy supplements the provisions set forth in the Code and is intended to raise awareness of our approach to whistleblowing among our Employees.

Purpose

Scantime is committed to providing a mechanism for Employees to report suspected wrongdoing or dangers in relation to Scantime's activities and have those concerns addressed in a timely and confidential manner. In scenarios where one Employee suspects another Employee of wrongdoing, or has other concerns covered by Scantime's Code of Business Conduct and Ethics (the "Code"), that Employee should refer to this Policy and to the Code on the appropriate course of action.

Responsibilities

All Employees are responsible for ensuring this Policy and the procedures set forth herein are used correctly, in line with the expectations of Scantime and in compliance with applicable legislation.

Whistleblowing Procedure

Scantime is committed to conducting its business with honesty and integrity and all staff are expected to maintain high standards and act in accordance with the Code. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to Scantime's activities.

This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It also includes any other matter detailed in the Code. Any suspected wrongdoing should be reported as soon as possible.

How to raise a whistleblowing concern?

If an Employee has a whistleblowing concern, Scantime hopes that in most cases they will feel able to raise those concerns with their supervisor. However, where they prefer not to raise it with their supervisor for any reason, they should contact the Human Resources ("HR") Department or the Company's internal legal counsel.

Scantime will arrange a meeting with the Employee as soon as possible to discuss their concerns. In the event you do not want to report violations to your supervisor, HR, or internal legal counsel, you can always make a report through the Company's reporting hotline. Our reporting hotline (the "Reporting Hotline") is managed by an independent third party.

The Reporting Hotline allows anyone to call anonymously (if they so choose) to report suspected unethical, illegal or unsafe behavior in English and other languages. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. Refer to "Schedule A" to this Policy for the Reporting Hotline phone numbers by jurisdiction.

Confidentiality

The confidentiality of reported violations will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. You may wish to identify yourself to facilitate our investigation of any report; however, you can make an anonymous report by calling the Reporting Hotline.

The party receiving the initial report must record its receipt, document how the situation was dealt with and file a report with internal audit, which will be retained for the record. The Chief Internal Auditor will report all illegal and unethical conduct in violation of the Code to the appropriate Scantime Board of Directors, or a committee thereof as appropriate, and externally in accordance with applicable laws.

External Disclosures

The aim of this Policy and the Code is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, Employees should not find it necessary to alert anyone externally. The law recognizes that in some circumstances it may be appropriate for Employees to report their concerns to an external body such as a regulator.

It will rarely, if ever, be appropriate to alert the media. Scantime strongly encourages Employees to seek advice before reporting a concern to anyone external. Employees can always contact Scantime's Reporting Hotline.

Zero Tolerance for Retaliation or Malicious Acts

Employees who raise a whistleblowing concern or participate in good faith in any investigation must not suffer any form of retaliation or victimization as a result. Scantime will treat very seriously any acts of victimization or retaliatory action taken against Employees who, in good faith, raise a whistleblowing concern and/or participate in a whistleblowing investigation.

Victimization or retaliation in these circumstances may be unlawful and any Employee who is found to have violated this provision will be subjected to disciplinary action under Scantime's disciplinary procedure, including but not limited to dismissal.

Employees who feel they are being or have been victimized or retaliated against should report this immediately to their supervisor or to the HR team. However, if a whistleblowing concern is found to have deliberately falsified or made maliciously or in bad faith, the Employee concerned may be subjected to disciplinary action under Scantime's disciplinary procedure, including but not limited to dismissal.

Management is responsible for reviewing this Policy on an annual basis to ensure consistency and compliance with applicable law, the Code, and other applicable corporate policies.