


			Document Number: CORP-WW-Policy-0002	
			Revision No.:	2
			Initial Issue Date:	Nov 1, 2023
WHISTLEBLOWER POLICY			Last Revision Date:	July 3, 2024
Prepared by: Legal	Reviewed by: CFO	Approved by: CEO	Next Review Date:	Nov 2026
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1.0 Background & Objectives

- 1.1 This Whistleblower Policy (the **Policy**) has been developed in the context of the Canadian Securities Association Multilateral Instrument 52-110 (Audit Committees, s. 2.3(7)), and the U.S. Sarbanes-Oxley Act Section 806 (Protection for Employees of Publicly Traded Companies who Provide Evidence of Fraud).
- 1.2 As a publicly traded company, ACT Energy Technologies Ltd. (**ACT**), and all of its subsidiaries and affiliates (collectively, the **Company**) must ensure the integrity of its financial information, which guides the decisions of the Board of Directors and is relied on by our shareholders and the financial markets. ACT has implemented this Policy to govern the receipt and treatment of concerns of any nature, but specifically concerns regarding accounting, internal accounting controls, auditing matters, or the reporting of questionable accounting or auditing matters (**Auditing and Accounting Matters**).
- 1.3 The objectives of this Policy are as follows:
- 1.3.1 to ensure that the Audit Committee of the Board of Directors of ACT has established a procedure for the receipt, retention and treatment of complaints received by the Company regarding Auditing and Accounting Matters; and
 - 1.3.2 to provide for the confidential, anonymous submission by employees and others, of concerns regarding Auditing and Accounting Matters.

We also want employees and third parties or external stakeholders that we deal with (suppliers, customers, shareholders, members of the public etc.), who have concerns about compliance by any person with the Company's Code of Business Ethics and Conduct (the **Code**), or any aspect of the Company's operations, whether with respect to Auditing and Accounting Matters or otherwise, to voice those concerns without fear that speaking up would be disloyal to their colleagues or to the Company and without fear of retaliation.

- 1.4 This Policy is intended to encourage and facilitate the raising of concerns in a timely fashion and within the Company, rather than overlooking a problem or seeking a resolution of the problem outside the Company. It is also intended as a clear statement that if any wrongdoing by the Company or any of its employees or by any of its contractors or suppliers is identified and reported to the Company, it will be investigated and remedied if appropriate. The Company will also examine means of ensuring that such wrongdoing can be prevented in future.


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2.0 Application

- 2.1 This Policy applies to all employees and contractors working for ACT and all of its subsidiaries and affiliates worldwide.

3.0 Reporting Concerns

- 3.1 Anyone with a complaint or concern about a violation of the Code, any Auditing or Accounting Matters, or a violation of any applicable law or policy, should report the complaint or concern through appropriate channels. If an employee, contractor or third party has experienced or witnessed a breach or potential breach of any of the foregoing, please promptly report the circumstance to one of the following:
- 3.1.1 Your supervisor/manager or a Vice President responsible for the applicable department or function;
 - 3.1.2 Human resources (in your division or at ACT's head office);
 - 3.1.3 The corporate *Business Ethics Hotline*, specifically for anonymous reporting where the information is of a serious and sensitive nature, or where members of senior management or the Board of Directors are suspected to be involved:
 - Toll free at: 1-866-921-6714 (Canada & USA)
 - Email: actenergy@integritycounts.ca
 - Web: <https://www.integritycounts.ca/org/actenergytechnologies>
 - By mail: ACT Energy Technologies Ltd.
6030 – 3rd St. S.E.
Calgary, Alberta T2H 1K2
Attention: Chair of the Audit Committee OR Legal Department
- 3.2 Our third-party communications program, *Integrity Counts*, provides the Company with our *Business Ethics Hotline*. ACT's *Business Ethics Hotline* allows all of the Company's employees, contractors, suppliers and any other third party to anonymously report sensitive work-related issues anonymously if desired. While this service is primarily intended to manage complaints related to the Code and Auditing or Accounting Matters, any complaint where the reporter wishes to remain anonymous may be made through this system.
- 3.3 Complaints reported through any of the available channels should include as much detail as possible, consistent with the Company's objective of conducting adequate investigations into issues reported.

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Ideally, reports should include relevant dates, times, names of individuals involved, witness names and the underlying facts giving rise to the complaint.

4.0 Prohibition Against Retaliation

- 4.1 Retaliation occurs when an individual experiences or is subject to negative consequences due to reporting or participating in an investigation. Retaliation against an individual who reports a concern or who participates in an investigation is prohibited.
- 4.2 Any employee or contractor who makes a disclosure or raises a concern under this Policy will be protected from retaliation if the individual making the report:
- 4.2.1 discloses the information in good faith;
 - 4.2.2 reasonably believes the information to be substantially true;
 - 4.2.3 does not act maliciously or make false allegations; and
 - 4.2.4 does not seek any personal or financial gain in connection with the issue reported.
- 4.3 Any employee or contractor who participates in an investigation will be protected from retaliation if the individual:
- 4.3.1 participates in the investigation in good faith; and
 - 4.3.2 is truthful in providing information, to the best of their knowledge.
- 4.4 Any employee or contractor who believes that they are experiencing retaliation should contact the Legal Department directly or file a complaint in accordance with this Policy.

5.0 False or Malicious Allegations

- 5.1 ACT is proud of its reputation and is committed to ensuring that adequate resources are put into investigating the complaints it receives. We take very seriously any allegations which are made maliciously or where the reporter knows or reasonably ought to know are false.
- 5.2 The making of any deliberately false or malicious allegations by any employee or contractor of the Company is a serious disciplinary offence that will result in disciplinary action, up to and including termination.


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6.0 Investigation Procedure

- 6.1 Complaints will generally be investigated in accordance with the Investigation Procedure, available from the Legal Department and on ACT's portal.
- 6.2 Resources will be involved in an investigation as appropriate, including but not limited to internal resources such as human resources and safety, and external resources such as ACT's Audit Committee, Board of Directors, third party investigators or external agencies.
- 6.3 If the complaint reported does not reveal sufficient detail to allow for a reasonable investigation, we will endeavor to follow up with the complainant. If insufficient detail persists, the investigation will not proceed until sufficient detail to conduct a reasonable scope of investigation is received.
- 6.4 Concerns will be investigated as quickly as possible however the seriousness and complexity of a complaint, and whether the investigation involves internal or external resources, will impact the time it takes to investigate a matter.

7.0 Confidentiality

- 7.1 Information gathered during an investigation will only be disclosed for the purpose of conducting the investigation, as compelled by law or as required pursuant to ACT's internal reporting protocols. Unauthorized or inappropriate disclosure of confidential information relating to a complaint or investigation may result in disciplinary action, up to and including termination.
- 7.2 All participants in investigations must keep all related information confidential, even once the issue is resolved, except as is necessary to deal effectively with the complaint or as required by law to be disclosed. Generally, the details of a complaint are only to be disclosed as follows:
 - 7.2.1 To investigate and respond to an inquiry or complaint; and
 - 7.2.2 To advise the respondent about the complaint and the identity of the complainant.

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8.0 Related Documents

Document Name	Document Number
Code of Business Ethics & Conduct	CORP-WW-Policy-0001

Prior revision dates: June 2005; March 2021 (*Audit and Accounting Matters – Complaint Procedures*)