

WELL Health Technologies Corp.
(the “Company”)

January 1, 2024

HUMAN RIGHTS POLICY

OVERVIEW

The Company 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**”). The Company respects the dignity of every person. The Company is firmly committed to providing equal opportunities in the workplace to enable every person to contribute fully. We also value the protection of human rights within the communities in which we operate.

This policy outlines how we will strive to make our workplace more supportive, safe and equitable for everyone.

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 employees and contractors to know that the Company will uphold Human Rights in the Workplace, and is committed to upholding Human Rights in its interactions with customers and suppliers.

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 Company related work or interactions take place, including (but not limited to) the following:

- Corporate office, clinic and other work sites of the Company, including washrooms, vehicles, digital locations, and any other location where Company related work is being conducted;
- Places where employees or others have gathered as a result of Company related responsibilities; and
- Attendance at Company sponsored conference, training or social event.

SCOPE

It is every employee'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 employees, as well as independent service providers, clients and visitors while attending a Company Workplace.

This policy applies when the Company is purchasing the services of others and when we are the provider of the services. When working with service providers, we encourage them to uphold these principles and urge them to adopt similar policies within their own business. For the Company employees, 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 Company policies and guidelines:

- Employee Handbook
- Code of Business Conduct and Ethics
- Electronic Monitoring Policy
- Access to Personal Information Policy
- Workplace Violence, Discrimination, Bullying and Harassment Policy
- Whistleblower Policy

Where this policy conflicts with another Company policy, this policy takes precedence.

POLICY

Company 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 Company's core values, including our value of treating others the way we want to be treated, as well as a violation of the law.

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

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

INTERNATIONAL APPLICATION

The Company 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.

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

RESPECT FOR HUMAN RIGHTS

Employees are expected to uphold and abide by this policy and shall:

- Respect at all times the dignity and Human Rights of staff and others;
- Adopt and practice inclusive and diverse workplace programs that are welcoming of every person and group;
- Listen to, consider and learn from others' views and experiences as you conduct business;
- Evaluate, actively seek to identify, and correct or report any workplace practices that:
 - Appear neutral but may discriminate against an individual or group
 - Impose extra burdens or deny benefits to an individual or group
- Build a safe and healthy workplace for everyone, both physically and mentally;
- Respect our clients' privacy and respect their personal information, always adhering to applicable privacy laws;
- Refrain from behaving in an abusive way towards others, including:
 - Using derogatory comments;
 - Initiating or spreading hurtful rumours;
 - Swearing at someone;
 - Using insulting behaviour;
 - Making physical threats;
 - Making unwelcome sexual advances or attention;
 - Making threatening gestures or remarks;
 - Telling offensive jokes;
- Report any suspected or actual violation of this policy to your manager or Human Resources, whether you have witnessed or been subjected to discrimination or harassment; and
- Cooperate fully in any investigation of a harassment or discrimination complaint.

COMPLAINTS

The Company 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. To make a complaint, please contact your manager, Human Resources or the legal department. Suspected policy violations can also be reported through the process outlined in the Whistleblower policy.

ANTI-RETALIATION

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

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 Human Resources to discuss an appropriate accommodation.

COMPLIANCE

Employees must comply with all aspects of this policy and support others in doing so. Employees are responsible for promptly reporting a suspected or actual violation of this policy, without fear of reprisal, to their manager or Human Resources 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.

Employees 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.