



Whistleblower Policy

Version 1.0.2

Effective November 16, 2024 (last updated August 26, 2025)

I. PURPOSES

Hedera Hashgraph LLC (“**Hedera**”) is committed to honest, ethical and lawful conduct, full, fair, accurate, timely and transparent disclosure in all public communications, and compliance with applicable laws, rules and regulations. In furtherance of these commitments, all directors, officers, employees, members, member representatives, contractors, and fellows of Hedera (each, a “**Covered Person**” or “**you**”) must act in accordance with all applicable laws and regulations, and with the policies of Hedera at all times, and assist in ensuring that Hedera conducts its business and affairs accordingly.

This Whistleblower Policy (this “**Policy**”) (a) establishes procedures for the reporting and handling of concerns regarding action or suspected action taken by or within Hedera that is or may be illegal, fraudulent or in violation of any policy of Hedera, as well as any other matter that could cause serious damage to Hedera’s reputation (each, a “**Concern**”), and (b) prohibits retaliation against any Covered Person who reports a Concern in good faith.

By appropriately responding to Concerns, we can better support an environment where compliance is valued and ensure that Hedera is meeting its ethical and legal obligations.

II. WHEN TO RAISE A CONCERN

You have an affirmative duty to disclose to and seek guidance from an appropriate supervisor or manager if you believe any Covered Person or other person associated or doing business with Hedera has engaged, is engaging, or may engage in any illegal or unethical behavior or has violated, or may violate any law, rule, regulation, or policy of Hedera. Such reportable activity may include, for example, financial wrongdoing (including circumvention of internal controls or violation of the accounting policies of Hedera), deliberate leaking of confidential information, fraud, harassment, or any other illegal, unethical, or proscribed conduct. While Concerns may be submitted at any time, you should endeavor to report a Concern as soon as reasonably possible after becoming aware of the matter.

III. HOW TO RAISE A CONCERN

Concerns may be submitted either in writing or orally. No form is required to submit a Concern, but you are encouraged to provide as much information and detail as possible so

that the Concern can be properly investigated. A Concern may be submitted:

- To the General Counsel at legal@hedera.com, the administrator of this Policy (the “**Policy Administrator**”);
- By discussing it with a supervisor or manager, who will in turn forward the Concern to the Policy Administrator for review where appropriate;
- To the Hedera Council President or any sitting Hedera Council Director, if the Concern is in regards to the Policy Administrator; or
- In writing to the Chair of the Board of Directors of Hedera (the “**Board**”), who will in turn forward the Concern to the Policy Administrator, or to a Hedera Director if the Concern is in regards to the Policy Administrator, for review where appropriate.

Concerns may be raised anonymously; provided, however, that any individual reporting his or her own violation shall not satisfy his/her obligation hereunder with a Concern raised anonymously. Hedera has established a secure, anonymous ethics form where you can report your concerns. To report your Concerns (other than against the Policy Administrator), you may visit the form [here](#) and submit your concerns 24 hours a day, 7 days a week. To report a Concern against the Policy Administrator, please email the Hedera Council President or any sitting Hedera Council Director directly.

IV. PROCEDURES FOR RECEIVING AND REVIEWING CONCERNS

Any supervisor, manager, or other person receiving a Concern must contact the Policy Administrator, who shall coordinate further action. Any failure to forward or act on a Concern is a violation of this policy and may result in disciplinary action up to and including termination of employment.

The Policy Administrator and/or the Policy Administrator’s designated Staff under the Policy Administrator’s supervision will assess each Concern on a preliminary basis to determine to what extent an investigation into the Concern is required, and will direct all aspects of the investigation of any Concern. The Policy Administrator will report each Concern to the Board or an authorized committee thereof. All investigations will be conducted in a confidential and sensitive manner, so that information will be disclosed only as needed to facilitate review of the investigation materials or otherwise as required by law. You must cooperate as necessary in connection with any such investigation.

The person who is the subject of a Concern shall not be present at or participate in Board or committee deliberations or vote on the matter relating to such complaint, provided that nothing herein shall prohibit the Board or committee from requesting that the person who is subject to the Concern present information as background or answer questions at a committee or Board meeting prior to the commencement of deliberations or voting relating thereto. In the event a Concern involves or implicates the Policy Administrator, the Policy Administrator will promptly recuse himself or herself from the investigation and inform the Board in writing. The Board may investigate such Concern or appoint impartial attorneys to investigate the Concern.

V. RECORDS OF CONCERNS AND INVESTIGATION REPORTS

The Policy Administrator and/or the Policy Administrator's designated Staff under the Policy Administrator's supervision will maintain a written record of all Concerns summarizing in reasonable detail for each Concern: the nature of the Concern (including any specific allegations made and the persons involved); the date of receipt of the Concern; the current status of any investigation into the Concern and information about such investigation (including the steps taken in the investigation, any factual findings, and the recommendations for corrective action); and any final resolution of the Concern. The Policy Administrator will distribute an update of this record to the Chair of the Board in advance of the last Board meeting of each quarter, or more frequently as the Policy Administrator may deem appropriate.

VI. CONFIDENTIALITY

All Concerns received will be treated confidentially or anonymously, as applicable, to the extent reasonable and practicable under the circumstances.

VII. NO RETALIATION AGAINST WHISTLEBLOWERS

It is Hedera's policy to encourage the communication of *bona fide* Concerns relating to the lawful and ethical conduct of Hedera's business. It is also the policy of Hedera to protect those who communicate *bona fide* Concerns from any retaliation for such reporting. **No adverse employment action may be taken and retaliation is strictly prohibited by law, including, without limitation, intimidation, harassment, discrimination, coercion, or otherwise, whether express or implied, against any director, officer, employee or volunteer of Hedera who in good faith reports any Concern or assists in an investigation of, or the fashioning or implementation of any corrective action or response made in connection with, any Concern.** Any person who violates this prohibition against retaliation will be subject to appropriate disciplinary action, which may include termination of employment or other relationship with Hedera. Such conduct may also result in criminal or civil charges and penalties by U.S. federal and/or state regulatory agencies as well as international regulatory agencies. Concerns should be raised in good faith, which means you have made a genuine attempt to provide honest and accurate information, even if you are later proven to have been mistaken. Hedera reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly. However, if you voluntarily report you were involved in a violation, self-reporting may be considered when determining the appropriate disciplinary action to be taken.

VIII. POLICY DISTRIBUTION

A copy of this Policy will be distributed to each Covered Person promptly following the adoption of or amendments to this Policy, and at such time as a person becomes a Covered Person.

IX. POLICY ADOPTION AND OVERSIGHT

The Board is responsible for providing oversight of the adoption and implementation of, and compliance with, this Policy.

This Policy was adopted by the Board on November 16, 2024.

Appendix A: Document Change Log

Version	Date	Author	Change Description
1.0.0	November 16, 2024	Hedera Legal	The Board approved the policy in a meeting.
1.0.1	February 11, 2025	Kate Ball	Administrative update to remove references to Hedera's former President.
1.02	August 26, 2025	Kate Ball	Administrative update to future-proof the Policy by removing the reference to an identified individual as the Policy Administrator and to instead reference the position of General Counsel.