



## Non-Retaliation Policy

### Purpose

Vybond Group, Inc. and its subsidiaries (“Vybond”) are committed to maintaining a workplace culture rooted in integrity, transparency, and accountability. This Non-Retaliation Policy affirms our zero-tolerance stance against retaliation and reinforces our commitment to protecting individuals who report concerns in good faith. We encourage employees and stakeholders to speak up about potential misconduct without fear of reprisal. This policy is intended to encourage reporting, protect individuals who report in good faith, and ensure compliance with all applicable laws, including whistleblower protections under federal and state regulations.

### Scope

This policy applies to all Vybond employees, former employees, officers, contractors, suppliers, customers, and other business partners. It covers all forms of retaliation resulting from reporting suspected violations of Vybond’s Guiding Principles, company policies, and/or applicable laws and regulations.

### Policy Statement

Vybond strictly prohibits any form of retaliation against individuals who, in good faith, report concerns, participate in investigations, or refuse to engage in unethical or unlawful conduct. Retaliation includes adverse actions such as termination, demotion, reassignment, harassment, or any other conduct that negatively impacts the individual’s employment or business relationship with Vybond.

### Reporting Channels

Employees and stakeholders may report concerns through the following channels:

- Directly to their Manager or Human Resources
- Legal & Compliance Team
- Confidential Ethics Helpline: Anonymous reporting is available through the [Paycom Helpline 24/7](#) . All reports will be investigated promptly and thoroughly.

### Good Faith Reporting

Reports must be made in good faith, meaning the reporter reasonably believes that misconduct has occurred or is likely to occur. Because false accusations may have a serious impact on the person accused, any employee who makes an accusation or files a complaint that they know to be false will be subject to discipline, up to and including immediate termination of employment.

### Protection Against Retaliation

Any employee who believes they have been subjected to retaliation should report the incident immediately using one of the reporting channels. Vybond will take appropriate corrective action, which may include disciplinary measures up to and including termination of employment or business relationships.



## Confidentiality

Vybond will maintain confidentiality to the greatest extent possible during the investigation process. Identifying oneself may assist in a more thorough investigation, but anonymity is respected.

## Accountability

Managers and leaders are expected to model ethical behavior and ensure that retaliation does not occur within their teams. Failure to uphold this policy may result in disciplinary action.

## Version Control

Date	Version Number	Purpose/Change	Author/Approver
December 15, 2025	1.0	Original Version	Sr Legal & Compliance Manager