

	Policy Level Companywide	Page Page 1 of 9	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022
COMPLIANCE AND QUALITY POLICY Issued: 1/17/2020			

Table of Contents

1.0	Purpose	1
2.0	Scope	1
3.0	Roles & Responsibilities	3
4.0	Policy	4
4.1	Quality Policy Statement.....	4
4.2	Security Operations Management Policy Statement.....	4
5.0	Global Compliance Team.....	5
6.0	Audits and Reviews.....	6
6.1	Independence and Objectivity	6
6.2	Annual Compliance Plan	7
6.2.1	Contract and Regulatory Audits	7
6.2.2	Financial & Quantitative Internal Audits	8
6.2.3	Annual Quality Plan	9
7.0	Compliance Checks	10

1.0 **Purpose**

The purpose of this Policy is to outline the requirements associated with the Company’s Regulatory Compliance Program (“Compliance Program”), its corporate certifications (e.g., ISO 9001, ISO 18788 and PSC.1), and associated internal reviews conducted by corporate departments and designated program management teams as well as reviews conducted by the Corporate Quality Department.

2.0 **Scope**

All personnel of Constellis Holdings, LLC and its affiliates (herein, “the Company” or “Constellis”) are responsible for complying with this Policy, and performing and participating in the Company’s Compliance Program, including communicating all policy, procedure and compliance-related information to personnel and the completion of all department/program Compliance Plans, Compliance Checks and participation in Internal Audits and related reviews as requested by the Legal Department, the Corporate Quality Department, the Internal Audit Function and/or the Company’s Executive Management Team.

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 2 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

3.0 Roles & Responsibilities

The following table describes the key roles associated with this Policy:

Role	Responsibilities
Chief Legal and Compliance Officer or his/her designee	<ul style="list-style-type: none"> Oversee the Compliance Program, including the tasking and running of the Global Compliance Team. Reporting results of the Compliance Program to the Regulatory and Compliance Committee of the Board of Directors (hereinafter, "Compliance Committee").
Global Compliance Team Members	<ul style="list-style-type: none"> Assist in identifying and mitigating compliance risks across the Company and executing the Company's Compliance Program..
Legal & Compliance Departments	<ul style="list-style-type: none"> Develop and oversee the Annual Compliance Plan. Conduct all contract and regulatory auditing tasks, policy review and development tasks, and communication and training tasks associated with the Company's Annual Compliance Plan. Oversee, review, and approve the Compliance Plans and Compliance Checks from corporate departments and program management teams. Report Compliance Check schedules and summary of results to the Global Compliance Team. Ensure appropriate escalation and management of problems/issues/deficiencies based upon all Compliance Program activities.
Head of Corporate Department and Program Management (VP, Director, Program Manager, Contract Manager etc.)	<ul style="list-style-type: none"> Define and prioritize annual compliance targets, complete Compliance Plan and/or identify Compliance Checks, specifying schedule, scope, sample sizes, etc. Ensure Compliance Plan and/or Compliance Checks are performed. Participate and ensure participation of staff in Compliance Checks and Internal Audits. Ensure problems/issues/deficiencies detected during Compliance Checks and Internal Audits are analyzed and appropriately addressed. Provide metrics and key performance indicators in order to ensure compliance with the Constellis Quality Management System including the Company's Security Operations Management Policy.
Corporate Quality Department	<ul style="list-style-type: none"> Oversee and lead corporate certification-related activities. Conduct QMS and SOMS Internal Audits, reporting results to the Legal and Compliance Departments and the Executive Management team, as necessary. Track findings associated with QMS and SOMS Internal Audits, to resolution.
Internal Audit Function	<ul style="list-style-type: none"> Develop Financial and Quantitative Internal Audit Plan in coordination with the Chief Legal Officer

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 3 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

Role	Responsibilities
	<ul style="list-style-type: none"> • Conduct Financial and Quantitative Internal Audits, reporting results to Legal and Compliance Departments and the Executive Management Team, as necessary. • Track findings associated with Financial and Quantitative Internal Audits to resolution.
Executive Management Team	<ul style="list-style-type: none"> • Ensure staff performs necessary duties associated with Compliance and Quality Programs, including but not limited to Compliance Plans, Compliance Checks and Internal Audits.
All Personnel	<ul style="list-style-type: none"> • All corporate personnel and personnel working at a client site or other non-corporate office location are responsible for reviewing any and all information received from their chain of command regarding compliance topics and participating in all Compliance related activities and audits. Additionally, all personnel are responsible for reporting any violations or potential violations of any of the Company's policies and procedures including, but not limited to, violations or incidents noted in the Company's Code of Business Ethics & Conduct and Incident Reporting Policy.

4.0 Policy

The Company maintains a robust Compliance Program as required under applicable laws and regulations. The Compliance Program has multiple components, including the Company's contract and regulatory auditing tasks, financial and quantitative internal audits, policy review and development tasks, communication and training tasks, and a Quality Program, which includes but is not limited to the Company's corporate certifications and overall Quality Policy including the Company's Security Operations Management Policy.

All Company personnel are required to adhere to compliance policies and the Company's Code of Business Ethics and Conduct. All personnel should set an example and, if they see a violation, they need to report it. Managers and supervisors must communicate, and personnel must review, compliance information and be familiar with the Company's policies and job duties. Departmental and program personnel are required to participate in all tasks associated with the Compliance and Quality Programs, including auditing, training, communication and/or the completion of regular Compliance Checks.

4.1 Quality Policy Statement

Constellis and its affiliates are committed to providing the highest quality of training, products and services, and to abiding by all applicable legal and standard-related requirements. We proactively take steps to avoid, prevent and reduce the likelihood of disruptive or undesirable events and their consequences. Respect for human rights, a commitment to safety, and caring for the environment are among our foremost priorities when conducting operations. We are dedicated to the continual improvement of our management systems, ensuring alignment with our corporate goals, and enhancing customer satisfaction.

4.2 Security Operations Management Policy Statement

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 4 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

Constellis and its affiliates are committed to supplying services to the highest standards in line with its legal, regulatory and voluntary commitments, organizational standards, and the requirements of Constellis clients. The Company’s reputation is built upon consistently delivering reliable, risk based, and cost effective services and performing as a trusted partner for its clients in all operating environments.

The Company pursues this commitment by adopting formal management systems across its business to assist in ensuring it consistently delivers to the expectations of its clients and other stakeholders. The objective of the management systems is to ensure that in all aspects of its business, the Company:

- Acts in accordance with commitments to human rights and public safety as the first priority;
- Avoids, prevents and reduces the likelihood and consequences of disruptive or undesirable events;
- Identifies client needs and assesses its ability to meet those needs safely and economically;
- Commits to comply with applicable international humanitarian law, human rights laws, and customary laws and agreements;
- Implements policy, procedure, and business controls as necessary, to ensure stakeholder needs are met;
- Provides adequate resources, training, and competent professionals to govern such controls;
- Sets objectives as part of overall business strategy;
- Reviews and reports performance against such previously conceived objectives;
- Reviews performance to ensure continual improvement; and
- Provides staff, contractors, and third parties with the ability to report in a confidential manner any issues that they deem necessary through its Ethics Hotline.

All personnel are responsible for the effective implementation of the Security Operations Management System. The management systems are designed to be compliant with and to uphold the principles of the:

- International Code of Conduct for Private Security Service Providers (2010);
- Montreux Document on Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict (2008);
- United Nations Guiding Principles on Business and Human Rights (2011); and
- Voluntary Principles on Security and Human Rights (2000) (“VPSHR”)

They are certified to the following standards, as applicable:

- ISO 18788 2015 Management system for private security operations — Requirements with guidance for use; and
- ANSI/ASIS PSC.1-2012 Requirements for Management Systems for Quality of Private Security Company Operations

The Company’s policies and processes are consistent with or exceed standards of “best practice” and the Company requires all personnel to adopt and comply with them to ensure that the

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 5 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

commitment to best practices in security operations is established as a culture throughout the organization.

5.0 Global Compliance Team

To ensure effective implementation of the Compliance Program, the Company maintains a Global Compliance Team, which is responsible for assisting in identifying compliance risks across the Company and executing the Company’s Annual Compliance Plan (*see* Section 6.1). The Global Compliance Team is a cross-functional group consisting of senior personnel from the following departments and programs: Legal, Corporate Quality, Compliance & Certifications, International Operations, North American Operations, National Security Operations, International Trade, Human Resources, Recruiting Operations & Support Services, Business Development, Security, Finance, Contracts, Global Support Operations, Risk Management, Information Technology, and Supply Chain.

The responsibilities and duties of the Global Compliance Team include, but are not limited to:

- Reviewing and refining the development of the Company’s Annual Compliance Plan;
- Assessing the Company’s risk environment, based upon a matrix of geography, program, and personnel;
- Assisting the Legal & Compliance team in designing and coordinating compliance reviews and monitoring activities;
- Identifying, discussing, and developing plan(s) to remediate any gaps in the system;
- Documenting, tracking, and monitoring initiatives to ensure accountability and progress toward minimizing and eliminating risk;
- Facilitating appropriate training to other segments of the Company and within individually led Departments and Programs covered by the Compliance Program(s);
- Serving as the primary point of contact for a Department and/or Program to ensure the Compliance and Quality Programs’ initiatives are communicated across the organization;
- Monitoring compliance with related Compliance Plans for their area of responsibility; and
- Overseeing and tracking completion of Compliance Checks for the Departments and/or Programs they represent on the Global Compliance Team or within their individual area of responsibility.

6.0 Audits and Reviews

A critical component of the Company’s Compliance Program centers on periodic audits and reviews of the Company’s operations. The Legal and Compliance Departments, in conjunction with the Corporate Quality Department and Internal Audit function (collectively, “Internal Auditors”), creates the Company’s Annual Contract and Regulatory Audit Plan, the Financial and Quantitative Internal Audit Plan and an Annual Quality Plan (collectively “the Annual Compliance Plan”) consisting of internal and external audits and reviews, policy review and development, and compliance-focused training. These specific efforts shall be based upon continual reviews and analysis of the internal and external risks facing the Company consistent with the Company’s Risk Management Policy and Framework.

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 6 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

After development, the Annual Compliance Plan is reviewed by the Global Compliance Team as detailed below and subsequently presented to the Compliance Committee for review and approval. The Legal and Compliance Departments are charged with tracking and monitoring the completion of the Annual Compliance Plan and reporting results directly to the Compliance Committee.

6.1 Independence and Objectivity

Internal Auditors will remain free from interference by any element in the organization, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of a necessary independent and objective process. Internal Auditors will have no direct operational responsibility or authority over any of the activities audited. Accordingly, they will not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair judgment. Internal Auditors will exhibit professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined. Internal Auditors will make a balanced assessment of all the relevant circumstances and not be unduly influenced by their own interests or by others in forming judgments.

6.2 Annual Compliance Plan

The Legal and Compliance Departments, in conjunction with the Corporate Quality Department and Internal Audit function, develop a proposed Annual Compliance Plan and submits it to the Global Compliance Team in the fourth quarter of every year for its review and refinement. The Annual Compliance Plan consists of the following:

- Proposed contract and regulatory auditing tasks;
- Proposed QMS/SOMS auditing tasks;
- Proposed financial and quantitative internal auditing tasks;
- Proposed policy review and development tasks;
- Proposed communication and training tasks; and
- Proposed compliance training plan through the Company’s electronic training platform.

The proposed contract and regulatory auditing tasks are developed based upon multiple factors, including, but not limited to: current risk analyses facing Company operations, results or findings from internal or external audits, financial exposure to the Company, the Corruption Perceptions Index (CPI) for the location of a department or program, the number of personnel associated with a department or program, internal or external reports of violations of Company policies or procedures, and the amount of time since a department’s or program’s most recent audit.

The proposed policy review and development tasks, the proposed communication and training tasks, and the proposed compliance training plan through the Company’s electronic training platform, are developed based upon multiple factors, including, but not limited to: recent changes or additions to applicable laws or regulations, results or findings from internal or external audits, and the amount of time since most recent review or training.

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 7 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

The Legal and Compliance Departments, in conjunction with the Corporate Quality Department, incorporate any feedback or suggestions from the Global Compliance Team unless so doing would undermine or conflict with the independence and objectivity of the Internal Auditors.

6.2.1 Contract and Regulatory Audits

As set forth in the Annual Compliance Plan, Legal and Compliance personnel conduct contract and regulatory audits of departments and programs to measure adherence to legal and/or contract requirements. Contract and regulatory audits are broken into different levels based upon the same factors utilized to develop the Annual Compliance Plan. While each contract or regulatory audit is unique based upon the specific risk factors associated with the particular program or department, the different levels generally include the follow:

- Level 1 (Desk Audit): Audits that focus on the review of relevant contract and process documents against contract and/or legal requirements. Telephonic or computer-based video interviews may be conducted with internal stakeholders when necessary to complete this type of audit.
- Level 2 (Management Audit): Audits that focus on the review of relevant contract and process documents against contract and/or legal requirements and management’s knowledge of and compliance with the same. Telephonic or computer-based video interviews are conducted with senior management and a randomized sample of line personnel to verify compliance with contractual and/or legal requirements.
- Level 3 (Onsite Audit): Onsite audits that focus on not only the scope identified in both Level 1 and Level 2 audits, but additionally on the evaluation of onsite compliance with all key risk areas for the department or program. Onsite and in-person interviews are conducted with senior management and key line personnel to evaluate their understanding and compliance with contractual and/or legal requirements.

All results of the contract and regulatory auditing tasks are shared with the Compliance Committee of the Board of Directors and relevant internal stakeholders to ensure that corrective actions are taken as needed and identified opportunities for improvement are appropriately evaluated and implemented in order to better establish compliance with legal and/or contractual requirements.

All Company personnel and subcontractors are required to actively participate in contract and regulatory audits by participating in meetings and interviews, and by providing documents and records as requested. They must also address and implement corrective actions where necessary and review the viability of implementing opportunities for improvement identified through the contract and regulatory audits.

6.2.2 Financial & Quantitative Internal Audits

As set forth in the Annual Compliance Plan, the Internal Audit function of the Legal and Compliance Team, shall develop the Financial and Quantitative Internal Audit Plan (“F&Q IAP”) to be scheduled for execution throughout the Company fiscal year. The F&Q IAP shall include all elements of internal financial cost and related systems and operations; from these investigative activities, measurements of adherence to legal requirements, Company-specific policies, directives and procedures, and financial community best practices will be prioritized. Additionally, all

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 8 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

aspects of program (contract) and functional finance-related activities and outcomes shall be reviewed and assessed for improvements or alterations.

Specific to the Internal Audit Charter, and consistent with the cognizance of the Legal and Compliance organization in which it is based, the scope of the F&Q Internal Audit Plan encompasses, but is not limited to: the examination and evaluation of the adequacy and effectiveness of the organization's governance, risk management and internal regulatory and financial controls, as well as the quality of performance in carrying out assigned responsibilities to achieve the organization's stated goals and objectives. Further, this Charter and associated responsibilities include:

- Evaluating the reliability and integrity of information and the means used to identify, measure, classify and report information stored within the Company's financial and associated systems of record. This includes the skillsets and training of personnel tasked with effectuating entries of cost data in the Company's systems of record.
- Evaluating the systems established to ensure compliance with Company policies, directives, plans, procedures, laws and regulations which could have a significant (material) impact on the organization or individual contractual performance.
- Evaluating the means of safeguarding assets and, as appropriate, verifying the existence of such assets.
- Evaluating contract, system and process data for current or prospective risk items that could place Company resources and results at risk. Related to the identification, efforts for mitigation and/or remediation shall be derived from the results, and analyses of same, with periodic follow-up reviews conducted to ensure issue resolution to the satisfaction of Company leadership.

The F&Q Internal Audits will vary in scope and may be conducted by external resources based upon the area being audited and the specific risk factors associated with F&Q Internal Audit. Should external resources be engaged for performance of any element of the F&Q IAP, those groups or individuals with work as a complement to the IA function, with planning and data gathered coordinated and shared, and shall adhere to the provisions of this Policy.

6.2.3 Annual Quality Plan

The Corporate Quality Department is responsible for the maintaining the Company's Quality Management System (QMS) and its Security Operations Management System (SOMS) for the departments and programs that are within the scopes of the different corporate certifications held by the Company (e.g., ISO 9001, ISO 18788 and PSC.1). The Annual Quality Plan consists of the following:

- Proposed number of corporate certifications for the Company (e.g., ISO 9001, ISO 18788 and PSC.1);
- Proposed scope of all corporate certifications;
- Proposed schedule of internal audits related to all departments and functions within scope of all corporate certifications; and
- Proposed timeframe of external audits for all corporate certifications.

The Corporate Quality Department shall make edits to the Annual Quality Plan as needed during

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 9 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

the calendar year to reflect business and operational needs. The proposed scope and number of corporate certifications for the Company is based upon a review of multiple factors, including, but not limited to: existence and scope of current corporate certifications, industry standards and best practices, and future business development opportunities and requirements.

6.2.3.1 QMS and SOMS External Audits

External audits are performed by an external auditor (or team of auditors) who are retained by the Company's Corporate Quality Department. The purpose of external audits is to verify that the Company's QMS and SOMS are effectively implemented against the relevant ISO or PSC.1 standards. External audits are usually conducted annually and are conducted pursuant to the schedule and scope of the Annual Quality Plan.

6.2.3.2 QMS and SOMS Internal Audits

The Corporate Quality Department performs QMS audits and SOMS audits of the departments and programs within scope in order verify adherence to corporate policies and procedures, to identify opportunities for improvement, and to ensure that its ISO 9001 Quality Management System, and ISO 18788 and PSC.1 Security Operations Management Systems remain fully implemented. These audits are conducted in accordance with the Internal Audits section of the QMS Overview (a document describing how ISO 9001 and other standard-related requirements are met at Constellis), and a published schedule.

QMS audits and SOMS audits vary in terms of scope, content and depth. General categories or types for these audits are provided below:

- Level 1 (SOMS Audit): Audit including a limited number of interviewees (typically no more than two or three) and a review of conformity to PSC.1 and/or ISO 18788, as well as a review of compliance with one or more program- or project-specific SOPs.
- Level 2 (QMS Procedural Audit): Audit including no more than two or three interviewees, and a review of a limited number policies or policy-related documents (typically from one to four).
- Level 3 (QMS Functional Audit-Limited): Audit including under 10 interviewees, and a review of some or most processes associated with a functional department.
- Level 4 (QMS Functional Audit-Expanded): Audit including 10 or more interviewees, and a review of all or most processes associated with a functional department.

All Company personnel and subcontractors must actively participate in QMS audits and SOMS audits by attending meetings and interviews, and by providing documents and records as requested. They must also address findings (nonconformities, potential nonconformities and opportunities for improvement) in a timely manner, and in accordance with the Nonconformity and Corrective Action section of the QMS Overview. Activities will include submitting documents and evidence of corrective actions by utilizing the Compliance & Quality Management PowerApp.

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 10 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

7.0 Department/Project Compliance Plans, Risk Assessments, & Compliance Checks

To leverage the expertise and knowledge of the Global Compliance Team, and to ensure that Company personnel across the organization understand the importance of compliance with all policies, procedures, contract requirements, and legal obligations, the Company requires that all programs and departments complete an annual Compliance Plan and/or a Risk Assessment in conjunction with a minimum of five Compliance Checks throughout the calendar year. Projects within scope of the Company's external PSC.1 and ISO 18788 certifications are required to complete a Risk Assessment and Compliance Checks. Additional Compliance Checks or other requirements may be added at the discretion of the Internal Auditors based upon the risks associated with particular departments or programs.

Compliance Plans and Compliance Checks ensure the overall delivery of high quality products and services to the Company's internal and external customers and further support the Company's Compliance Program by ensuring that the personnel with the best knowledge of their programs and departments are building compliance reviews into everyday operations.

If a department/project completes an annual Compliance Plan, the following areas must be documented:

- **Contractual Compliance:** if applicable, describe in detail the project's QA/QC process to ensure contract compliance with the PWS, SOW or other provisions governing the work on the project.
- **Adherence to Governance Documents:** describe in detail how the project/department ensures that personnel (a) have access to governance documents, (b) are made aware of new or updated governance documents, and (c) how personnel adhere to the requirements set forth in the governance documents.
- **Risk Assessment Overview/Description:** describe the process that the project/department uses to analyze risks specifically impacting the project/department. The description should include who is involved, how the risk assessment is documented and when/how it is reviewed. Notwithstanding the changes for 2022, many projects/departments are electing to continue to utilize the risk assessment process
- **Risk Mitigation Description:** describe in detail the process or procedures implemented to reduce and mitigate specific risks identified in the risk assessment.
- **Incident Reporting & Root Cause Analysis Description:** detail how incidents (like those identified in the Incident Reporting Policy and/or as required by contractual or regulatory requirements) are reported, including to whom, how and through what process. Also include a summary of how the project/department reviews incidents and identifies root causes for the incidents that do occur.
- **Due Diligence Confirmation:** projects/departments who retain Third Parties must verify whether they enter all Third Parties into the Company's GAN Due Diligence system. 2
- **Personnel Training & Evaluation Description:** project/departments must confirm and state how they train and evaluate personnel. Training topics should be listed and evaluation process

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 11 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

detailed. If Process is detailed in a separate document, that document can be uploaded along with the Plan.

- Employee/Personnel Notices Description: confirm that all employee and personnel notices (e.g., state/regulatory posters, USG posters, Company compliance posters, Ethics Hotline posters, etc.).

All Compliance Plans must be uploaded into the Compliance & Quality Management PowerApp and approved by the Compliance Department.

The following requirements govern Compliance Checks:

- All departments and programs must schedule and plan all of their Compliance Checks planned for the year no later than the end of first quarter of each calendar year.
- The topic and/or scope of Compliance Checks must be based on a department's or program's own internal procedures or work instructions and address risks identified through their department or program-level Risk Assessment contained in the Risk Management PowerApp.
- Each Compliance Check must be entered into the Compliance & Quality Management PowerApp platform for review and approval the by the Legal and Compliance Departments. Each Compliance Check must contain the following: a topic statement, a scope statement, anticipated date of completion, and identify the specific Risk identified on the Corporate Risk Register that the Compliance Check is meant to address. In addition, the department or program must identify an individual or individuals who are responsible for completing the Compliance Check.
- Once entered into the Compliance & Quality Management PowerApp, the Compliance Check will be reviewed by Legal and Compliance Departments. All Compliance Checks must be approved prior to execution.
- A Compliance Check will not be approved if it does not specifically relate to and address a Risk set forth in the Corporate Risk Register. If a Compliance Check is not initially approved, Legal and Compliance personnel will work with the applicable departments or programs to make the needed adjustments.
- Departments and programs are responsible for ensuring that all Compliance Checks are completed in accordance with the time parameters set in the initial schedules. Once completed, the responsible individual for the Compliance Check must enter the following information into the Compliance & Quality Management PowerApp: an executive summary of the Compliance Check, the conclusions and recommendations of the Compliance Check, provide a compliance rating for the Compliance Check, and attach evidence substantiating that the Compliance Check was completed as described in the executive summary. No Compliance Check will be approved until and unless all of this information is entered.
- When applicable, the Legal and Compliance Departments will report results as well as any issues associated with Compliance Checks during quarterly Global Compliance Meetings.

COMPLIANCE AND QUALITY POLICY	Policy Level Companywide	Page 12 of 12	
	Department Legal	Version No. 3.0	Effective Date 02/15/2022

- Additionally, the Corporate Quality Department will, on a sampling basis, verify Compliance Check evidence and reported summary results, and report findings to the Global Compliance Team and the Constellis Executive Management Team.

All Global Compliance Team personnel are responsible for serving as the primary point of contact for departments and/or programs under their purview with respect to the creation and completion of the Compliance Plans, Risk Assessments, and Compliance Checks for the departments and programs they represent on the Global Compliance Team.

RELATED DOCUMENTS

- Code of Business Ethics & Conduct
- QMS Overview
- Risk Management Policy and Framework

VERSION HISTORY

	Version	Version Date	Author	Description
1	1.0	1/16/2020	M. Taylormoore	Initial Policy to document existing Regulatory Compliance Program, procedures, and practices
2	2.0	2/15/2021	M. Taylormoore	Updates to include audit details and designations and update to Compliance & Quality Management PowerApp
3	3.0	2/15/2022	Todd Rouse	Updated to reflect current Compliance requirements