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POLICY AND GOVERNANCE DOCUMENT APPROVAL PROTOCOL Issued: 3/2/2020			

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1.0 Purpose

The purpose of this Policy is to set forth the requirements for the creation, approval, and issuance of Constellis, LLC and its affiliated companies (“Company”) Policies and all related documents such as Directives, Procedures, and other operational documents (“Governance Documents”). This Policy establishes the appropriate guidance, tools, and controls are documented and available for personnel to ensure that personnel perform their duties in accordance with the expectations and obligations of the Company.

2.0 Scope

This Policy is applicable to all employees seeking to establish Company Policies, Governance Documents, or Forms. Policy-making is a collaborative effort that should consider and encourage input from those affected by the Policy or other governing document, as appropriate.

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3.0 Policy

In order for a document to become an official Constellis Policy, the requirements of this Policy must be followed. **A Company Policy that has not been drafted, reviewed, approved, and issued according to the terms of this Policy is not an approved Company Policy and should not be presented or used as the official guidance or requirements of the Company.**

Individual Departments, Projects, and Contracts should post supplemental documents, such as Directives, Procedures, and Forms as set forth in this Policy. As with Policies, in order for our personnel to know of the requirements of their positions and the guidelines within which they are expected to operate, all documents governing employment shall follow this Policy and be posted to the Company’s Policy & Procedure Management Software via SharePoint. Initial copies of any Project or Department-specific documents must be provided to the Legal or Quality Departments for review in accordance with this Policy. A process for revisions to existing Policies or Governance Documents is also contained in this Policy. All documents must be created on and utilize the appropriate Templates available in the Policy & Procedure Management Software or from the Legal Department.

4.0 Definitions

Policies, Directives, Procedures and other operational guidance documents work together to provide the foundation for efficient and effective operations within an organization. The specific category or document created must conform to the following definitions.

- **Policies:** Policies are formalized requirements that outline roles, responsibilities, and expectations for personnel across all Constellis companies. Policies outline requirements that personnel must comply with based upon the laws, regulations, certifications, and values that the Company upholds. Policies are not Department or Contract/Project specific documents. Policies are approved by VPs or above.
- **Directives:** Directives are policies issued and implemented at below the companywide level. Individual Departments, Projects, and Contracts may issue a Directive when the guidance or requirements being presented are limited to personnel falling under that specific Department, Project or Contract. Directives are approved by the Department (Director or above) or Project or Contract Managers. However, there should be awareness and review by more senior levels of the Department, Project, and Contract, as appropriate.
- **Procedures:** Procedures are usually the next level of guidance below Company Policies or specific Directives. A Procedure details how a specific task or process should be completed. A Procedure document includes operational documents often referred to as processes, “Standard Operating Procedures” or SOPs. Procedures are approved by the Department (Director or above) or Project or Contract Managers. However, there should be awareness and review by more senior levels of the Department, Project, and Contract, as appropriate.
- **Other Governance Documents:** Other Governance Documents are usually either (1) general comments on a topic that do not require the issuance of a formal Company Policy, or (2) informal descriptions of how a manager expects his subordinates to perform certain

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tasks. They may, for example, reflect the Company’s current thoughts on how to manage certain processes or requirements to help control the flow of work and productivity, or they may provide helpful parameters for certain employees to ensure consistency in work products. Other Governance Documents are approved by Department or Contract/Project heads.

- **Forms:** Forms are templates or documents created to standardize and simplify the collection and presentation of information or data. They should be clear and easy-to-use, and seek the minimum amount of information necessary. Forms and Templates can be approved by the owner of the Form or Template.

5.0 Structure and Format

The structure and format for Company Policies, Directives, Procedures, or other Governance Documents are provided in the approved template documents located in the Legal Templates section of the Company’s Policy & Procedure Management Software via SharePoint. In order to have consistency in appearance and to be readily recognizable, Company Policies, Directives, Procedures and other related documents must be created on these Templates.

6.0 Policy-Making Process

Policy drafting, approval, and publication must follow the steps described in sections 6.1 through 6.4.

6.1 Policy Author/Issuing Department

The author of a Policy should be the Department Head responsible for oversight of the Policy’s implementation or the Department most affected by the Policy. This individual is responsible for the periodic review and revisions to the Policy.

6.2 Policy Drafting

Policies must be formatted in accordance with the Constellis Policy Template document. The Policy Template can be located in the Company’s Policy & Procedure Management Software via SharePoint and can also be provided by the Legal Department. The Policy should be concise and focus on providing only the necessary information and appropriate context. If areas of the Template are not applicable for a Policy, they do not need to be included. Depending on the nature of the Policy, it may be necessary or helpful to consult other affected Departments during the Policy drafting process.

Any forms or other documents related to or referenced in a Policy should be noted in the “Related Documents” section at the end of the Policy and should also be made available in the Policy & Procedure Management Software.

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6.3 Policy Approval

Once the Policy has been drafted, it must be approved for publication on the Company’s Policy & Procedure Management Software via SharePoint. Policy approval depends on the method of creation.

- If a new Policy is created inside the Company’s Policy & Procedure Management Software via SharePoint, there is a built in approval process based on the applicable Department. When starting the Policy, the system will prompt the user to complete a “Policy Type.” The user will need to locate the applicable “Department Name – Policy” from the options. This will populate the approval process. All Policies will ultimately be approved by the Department Head (VP or higher).
- If the Policy is created outside of the Company’s Policy & Procedure Management Software, once approved by the Department Head (VP or higher), a MS Word version of the draft of the Policy should be forwarded to the Legal Department for review by sending the document to policyapproval@constellis.com. The Legal Department will review the Policy and identify any concerns with the Policy or any potential impacts that must be addressed. Clarifications and edits will be worked by the Legal Department in collaboration with the applicable issuing Department. After any necessary changes have been made, the issuing Department head will provide final approval and a member of the Legal Department will post the approved version to the Policy & Procedure Management Software.

6.4 Policy Publication

Once the Policy receives final approval, the Policy will be posted in .pdf format to the Policy Portal. All Word versions of approved Policies will be maintained within the Policy & Procedure Management Software. Prior versions of an updated Policy will be “retired” but will remain housed in the Policy & Procedure Management Software.

Comments or questions on a published Policy shall be directed to the relevant issuing Department (e.g., a questions regarding an HR Policy should be directed to the HR Department) or to the Legal Department.

7.0 Policy Change/Revision/Re-Approval Process

It may be necessary to make revisions or changes to existing Policies to reflect the latest information or requirements that affect the Policy. If an update is needed, a Policy Owner can access the Word version of the Policy in the “creation” side of the Policy & Procedure Management Software. Revisions can be made in accordance with the Governance Document Management Directive.

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Additionally, outside of these as-needed changes, all Policies must be reviewed annually to confirm that their content remains appropriate and relevant. The Policy & Procedure Management Software will automatically prompt a Policy owner if a review is required. If no changes need to be made, a Policy can be renewed and reposted. Policy changes or revisions can be grouped into two classes: (1) minor changes and (2) major changes. All renewals, minor and major revisions shall be made in accordance with the Governance Document Management Directive.

8.0 Other Formats for Issuing Guidance

All processes or guidelines that govern the employment of Constellis employees and which are not otherwise contained in a contract, should be memorialized in a published document. As such, if there is a need to provide guidance, processes, forms, or other information to Company employees, this information shall be presented in other formats, such as company-wide Procedures, or Project- or Contract-level Directives/Procedures or other guidance documents. None of these other forms of governing documents may in any circumstance conflict with or provide instruction contrary to a Company Policy. In the event of such a conflict, the Company Policy shall take precedence.

All Directives, Procedures, or other governing documents, regardless of the issuing Department, Project or Contract, will be reviewed in accordance with this Policy and published in the Company’s Policy & Procedure Management Software. The only exceptions will be (1) internal department documents that describe only department-internal activities and requirements and (2) specifically-identified EMT or Board-level Policies or other documents posted with restricted access.

All Directives and Procedures should be created and formatted in accordance with the Templates located in the Legal Templates section of the Policy & Procedure Management Software and also available within the application for those process owners that are included in the internal workflow. Each Constellis entity has its own Templates and Project/Contract-level documents and documents should be created on the correct entity template (i.e., Corporate Procedures should be created on Constellis templates, WPS II Task Order 2 Directives should be created on Triple Canopy Templates, GSA TW Directives should be created on AMK9 Templates, etc.).

8.1 Non-Policy Document Approval

Once a non-Policy Governance Document has been drafted (Directives, Procedures, etc.), it must be approved for publication on the Company’s Policy & Procedure Management Software via SharePoint. Policy approval depends on the method of creation.

- If a new Governance Document is created inside the Company’s Policy & Procedure Management Software via SharePoint, there is a built in approval process based on the Department/Project/Contract. When starting the document, the system will prompt the user to complete a “Policy Type” – please locate the applicable Department or Contract Name from the list which will populate the approval process. All

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Governance Documents will be approved by the Department, Project or Contract Head (Sr. Director or above and/or PM).

- If the Governance Document is created outside of the Company’s Policy & Procedure Management Software, once approved by the Project/Program or Department Head, a MS Word version of the draft of the document should be forwarded to the Quality Department at quality@constellis.com. The Quality Department will upload the Word document into the Policy & Procedure Management Software and publish a .pdf version for view by the applicable workforce.

9.0 Using Company Policies or other Governance Documents

If you must consult a Company Policy or Governance Document in the course of performing a task, be sure to check that you are using the most up-to-date version of the Policy or Governance Document. All documents are subject to change, and it is each employee’s responsibility to stay informed of these changes. Therefore, all personnel should review the posted version of the applicable document on the Policy & Procedure Management Software available through the Policy Portal link on SharePoint.

RELATED DOCUMENTS:

- **Company Policy, Procedure, & Directive Templates**
- **Governance Document Management Directive**
- **Constellis’ Records Retention Schedule**

VERSION HISTORY

	Version	Version Date	Author	Description
1	1.0	3/2/2020	Todd Rouse	Initial version
2	1.1	3/10/2020	Todd Rouse	Corrected Table of Contents
3	2.0	4/1/2021	Todd Rouse	Updated to capture new system and process.