

	Policy Level Companywide	Policy No. HR-003	Page Page 1 of 2
	Department Human Resources	Version No. 2.0	Effective Date 05/03/2021
OPEN DOOR POLICY Issued: 10/05/2015			

Table of Contents

1.0 Purpose 1

2.0 Scope 1

3.0 Policy 1

1.0 Purpose

The purpose of the Open Door Policy is to ensure employees know they have additional channels of communication outside of their immediate chain to report concerns or issues. Employees may raise concerns through any member of Company management. This open channel created by Constellis, LLC and its affiliated entities (the “Company”) is intended to address and clarify issues of concern without the fear of reprisal, retribution, or retaliation.

2.0 Scope

All employees and subcontractor personnel are authorized access to management personnel by using the Open Door Policy.

3.0 Policy

The Company encourages employees to use their chain of command as the primary means of communication with management or for raising concerns. However, if a matter is sensitive or requires the attention of a manager other than the immediate manager or management chain, or if for whatever reason an employee does not feel comfortable raising it to their immediate supervisor, the issue can and should be brought to the attention of any manager within the Company for appropriate action. It is incumbent upon that manager to take appropriate action in addressing the issue(s) and bring the matter to the attention of the Human Resources Department or raise the issue to senior management for resolution.

If an employee does not feel comfortable raising a concern to management, they may use the Company’s Ethics Hotline via phone (1-844-637-6751) or the web (constellis.ethicspoint.com), they may contact the Legal Department (legal@constellis.com), or they may contact the Human Resources Department (hr@constellis.com). Personnel based in Afghanistan or Iraq can make a reverse charge or collect call to the United States using the following numbers: Afghanistan (001-5033526170) or Iraq (001-5033526174).

A key concept of the Open Door Policy includes the perspective that managers cannot retaliate against an employee for making an Open Door request. In accordance with its Anti-Retaliation and Whistleblower Policy, the Company will not tolerate retaliation against any person who makes a good faith complaint of a violation. It is a violation of this Policy for any person to engage in any form of retaliation.

OPEN DOOR POLICY	Policy Level Companywide	Policy No. HR-002	Page Page 2 of 2
	Department Human Resources	Version No. 2.0	Effective Date 5/3/2021

Additionally, depending on the circumstances, employees may have certain legal protections under whistleblower statutes for information brought to the attention of management.

Anonymity and confidentiality of Open Door Policy issues should be observed, as appropriate. Only managers with a “need to know” should be involved in issue resolution.

RELATED DOCUMENTS

- **Anti-Retaliation and Whistleblower Policy**

VERSION HISTORY

	Version	Version Date	Author	Description
1	1.0	10/05/2015	Human Resources	Initial version
2	1.1	10/14/2016	Kiersten Miller	Company logo edited, Ethics Hotline e-mail edited
3	1.2	11/2/2017	Kiersten Miller	Ethics Hotline Information Updated
4	2.0	5/3/2021	Beth A. Skoletsky	Changes throughout