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|---|--|-----------------------------|------------------------------------|
|  | <b>Policy Level</b><br>Enterprise-wide | <b>Policy No.</b><br>CH-008 | <b>Page</b><br>Page 1 of 3         |
|   | <b>Department</b><br>Legal             | <b>Version No.</b><br>2.2   | <b>Effective Date</b><br>2/15/2022 |
| <b>INCIDENT REPORTING POLICY</b><br><b>Issued: 06/26/2017</b>                     |  |                             |                                    |

**Table of Contents**

**1.0 Purpose .....1**

**2.0 Policy Summary .....1**

**3.0 Scope .....2**

**4.0 Incident Reporting.....2**

**5.0 Investigation .....3**

**6.0 Monitoring.....3**

**1.0 Purpose**

Constellis Holdings, LLC and its affiliates (“the Company”) are committed to conducting business honestly, ethically, and in accordance with applicable laws and regulations of the U.S. and other countries and jurisdictions in which the Company operates. The purpose of this Policy is to establish the Company’s methods for reporting Incidents to the Company and the protections afforded to the individuals who report them.

**2.0 Policy Summary**

The Company supports an open and robust Incident reporting system, with reporting channels that are open to Company employees, persons working on behalf of the Company, and third parties. The ability to inform the Company of possible issues is an important tool for the early identification of problems, and provides an opportunity for the Company to resolve issues before they cause damage or harm, or to take action to mitigate any damage or harm that has already occurred. Consistent with its internal procedures, reported Incidents will be reviewed and investigated by the Company promptly and appropriate remedial measures will be undertaken, including notification to outside entities when required by applicable contractual terms, laws, or regulations.

This Policy will refer to incidents, complaints, grievances, or general concerns as an “**Incident.**” An Incident includes, but is not limited to, the following:

1. Any use of force (lethal or non-lethal);
2. Any discharge of a firearm(s) by personnel, intentionally or unintentionally, other than during supervised training;
3. Near-misses where lessons need to be learned and action taken to prevent a re-occurrence;
4. Use of threats or other intimidation measures;
5. Any casualties or serious physical injuries;
6. Loss of sensitive information or equipment;
7. Request for or payment of compensation of any value to third parties;

|                                  |  |                             |                                    |
|----------------------------------|--|-----------------------------|------------------------------------|
| <b>INCIDENT REPORTING POLICY</b> | <b>Policy Level</b><br>Enterprise-wide | <b>Policy No.</b><br>CH-008 | <b>Page</b><br>Page 2 of 4         |
|                                  | <b>Department</b><br>Legal             | <b>Version No.</b><br>2.2   | <b>Effective Date</b><br>2/15/2022 |

8. Allegations of physical or substance abuse;
9. Potentially illegal practices and/or violations of applicable U.S., international, or local law, regulation, or contractual obligation;
10. Theft, financial impropriety, fraud, falsification of records or documents, or other financial crime;
11. Information technology breach or data spill;
12. Any act that has the potential to damage the Company's reputation, or that of its customers;
13. Complaints made by a customer or national authority;
14. Potentially dangerous situations;
15. Nonconformance with the principles of the *Montreux Document*, the ICoC, and/or PSC.1 standard;
16. Human rights violations; and/or
17. Unethical acts, and/or potential violations of the Company's Code of Business Ethics & Conduct or any Company Policies, Procedures, or Directives.

All personnel are required to report Incidents in line with the guidelines in Section 4.0 below. The Company prohibits any form of retaliation for reporting Incidents as detailed in the Company's Anti-Retaliation and Whistleblower Policy.

### **3.0 Scope**

This Policy applies to all Company employees, independent contractors, consultants, representatives, other persons acting on behalf of the Company.

### **4.0 Incident Reporting**

In order to permit appropriate action by the Company, Incidents must be reported in accordance with the following:

- An employee who has knowledge of an alleged Incident must submit an initial verbal or other summary report to his or her supervisor as soon as possible, but no later than twelve (12) hours, after the Incident occurred. The report should summarize the nature of the Incident and give enough detail to permit up-the-chain reporting, coordination of response resources, or other immediately-necessary actions. Up-the-chain reporting will be made as soon as possible after the initial report from the employee.
- Incidents alleging criminal acts, violations of human rights, or imminent danger must be reported by Project Management to their respective Executive Management Team member as well as the Chief Legal Officer as soon as possible, but no later than six (6) hours after Project Management was made aware.
- If a particular project or geographical location has incident reporting procedures that differ from this Policy, then the project-specific requirements shall apply in addition to this Policy.
- If reporting to a supervisor is not possible or presents a problem due to the nature of the Incident, then the employee may escalate the report to a higher-level supervisor or the Chief

|                                  |  |                             |                                    |
|----------------------------------|--|-----------------------------|------------------------------------|
| <b>INCIDENT REPORTING POLICY</b> | <b>Policy Level</b><br>Enterprise-wide | <b>Policy No.</b><br>CH-008 | <b>Page</b><br>Page 3 of 4         |
|                                  | <b>Department</b><br>Legal             | <b>Version No.</b><br>2.2   | <b>Effective Date</b><br>2/15/2022 |

Legal Officer, or he or she may anonymously report the Incident using the Company’s Ethics Hotline.

The Ethics Hotline is hosted by a third party provider so employees and third parties can make reports to the Company on a totally confidential and anonymous basis, if so desired. Ethics Hotline reports can be made via the web at [constellis.ethicspoint.com](http://constellis.ethicspoint.com) or through the following telephone numbers:

- In the United States & abroad: personnel and third parties can dial **1-844-637-6751**.
- In Iraq: personnel and third parties can make a reverse charge or collect call to the United States using the following number: **001-5033526174**. All reverse charge or collect calls will be accepted by the contact center using an automated English message.

Failure to report the Incidents listed in section 2.0 may result in disciplinary action, up to and including termination. If you encounter a situation in which you are unclear on the appropriate course of action, you should always feel comfortable discussing the issue with your supervisor or reporting it to the Chief Legal Officer, or his or her designee. Remember that no unethical or illegal acts can be justified by saying they benefited the Company, or were directed by a higher authority in the Company.

## **5.0 Investigation**

Following the notification of an Incident, the Chief Legal Officer may elect to initiate an Investigation into the circumstances, to record findings and conclusions, and to make a recommendation to the relevant stakeholders. Incidents alleging criminal acts, violations of human rights, or imminent danger will be investigated immediately. No official Company investigations, other than criminal history background checks, may be initiated or conducted without the approval and direction of the Chief Legal Officer or his or her designee. All investigations conducted at the direction of the Chief Legal Officer will be conducted in accordance with the Company’s Investigations Procedure.

## **6.0 Monitoring**

Metrics related to Incident reports will be reported to management during the Security Operations Management System (SOMS) Management Review Meetings as well as regularly to the Board of Directors. Based on review by applicable stakeholders and in accordance with the Investigations Procedure, recommendations for improvement may be identified to include changes to incident-related procedures, additional training, etc.

## **RELATED DOCUMENTS**

- **Code of Business Ethics and Conduct**
- **Anti-Retaliation and Whistleblower Policy**
- **Investigations Procedure**

## **VERSION HISTORY**

|   | <b>Version</b> | <b>Version Date</b> | <b>Author</b>       | <b>Description</b>                    |
|---|----------------|---------------------|---------------------|---------------------------------------|
| 1 | 1.0            | 06/26/2017          | Melissa Taylormoore | Initial version                       |
| 2 | 1.1            | 08/28/2017          | Chris Glover        | Minor revisions throughout the policy |
| 3 | 2.0            | 05/01/2020          | Todd Rouse          | Updates throughout                    |
| 4 | 2.1            | 10/26/2020          | Todd Rouse          | Update to Section 4.0                 |

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|----------------------------------|--|-----------------------------|------------------------------------|
| <b>INCIDENT REPORTING POLICY</b> | <b>Policy Level</b><br>Enterprise-wide | <b>Policy No.</b><br>CH-008 | <b>Page</b><br>Page 4 of 4         |
|                                  | <b>Department</b><br>Legal             | <b>Version No.</b><br>2.2   | <b>Effective Date</b><br>2/15/2022 |

|   | <b>Version</b> | <b>Version Date</b> | <b>Author</b> | <b>Description</b>         |
|---|----------------|---------------------|---------------|----------------------------|
| 5 | 2.2            | 02/15/2022          | Todd Rouse    | Minor revisions throughout |