

Whistleblowing Process for Inflectra Corporation

Purpose:

This process aims to provide a clear, confidential, and safe method for employees, contractors, vendors, or any other stakeholders to report concerns about unethical behavior, illegal activities, or violations of company policies. The goal is to protect the company's integrity, ensure compliance, and maintain a safe, fair working environment.

Scope:

This process applies to all employees, contractors, partners, customers, and third-party affiliates of Inflectra Corporation.

1. What Constitutes a Whistleblowing Concern?

Whistleblowing concerns may include, but are not limited to:

- **Illegal activities:** Fraud, theft, corruption, bribery, or any violation of laws or regulations.
 - **Ethical violations:** Discrimination, harassment, exploitation, or any breach of ethical guidelines.
 - **Health and safety concerns:** Workplace hazards or unsafe working conditions.
 - **Financial malpractice:** Mismanagement, embezzlement, accounting irregularities, or financial fraud.
 - **Non-compliance:** Failure to adhere to applicable industry standards, privacy laws, or company policies.
 - **Environmental harm:** Actions leading to environmental degradation or violation of environmental regulations.
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2. Reporting Procedure

A. Internal Reporting Channels

- **Immediate Supervisor:** Employees are encouraged to report concerns to their direct supervisor, unless the supervisor is involved in the issue.
- **HR or Compliance Department:** If the concern cannot be reported to a supervisor or if the employee feels uncomfortable doing so, they may report the concern to the HR or Compliance team via:
 - Email: hr@inflectra.com
 - Phone: +1 202 558 6885 x406

B. External Reporting Channels

If an employee feels that the company's internal procedures are not effective or appropriate, they may report concerns to external authorities:

- **U.S. Government Agencies:**
 - **Securities and Exchange Commission (SEC)** (for financial fraud or misrepresentation): <https://www.sec.gov/enforcement-litigation/whistleblower-program>
 - **Occupational Safety and Health Administration (OSHA)** (for health and safety concerns): <https://www.osha.gov/whistleblower/wbcomplaint>

- **Federal Trade Commission (FTC)** (for consumer protection violations):
<https://oig.ftc.gov/whistleblower-protection>
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3. Confidentiality and Protection from Retaliation

- **Confidentiality:** All whistleblowing reports will be treated with confidentiality. Identifying information of the whistleblower will only be shared on a need-to-know basis and with the whistleblower's consent, unless required by law.
 - **Retaliation Protection:** Inflectra Corporation prohibits retaliation against employees or individuals who report concerns in good faith. Retaliatory actions, including but not limited to, termination, demotion, harassment, or intimidation, will result in disciplinary action. Any whistleblower who believes they have been retaliated against should immediately report the incident using the same channels listed above.
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4. Investigation and Follow-up

- **Acknowledgment of Report:** All reported concerns will be acknowledged within five (5) business days.
 - **Investigation Process:** The Compliance Team will conduct a thorough investigation in a timely and objective manner. Investigations will be impartial, and all parties involved will be given an opportunity to provide evidence and respond to findings.
 - **Outcome:** Following the investigation, appropriate action will be taken based on the findings. This may include disciplinary action, corrective measures, or legal proceedings, depending on the severity of the concern.
 - **Feedback to Whistleblower:** If the whistleblower provided contact information, they will be informed of the outcome of the investigation, as appropriate, subject to confidentiality and legal constraints.
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5. Training and Awareness

- **Annual Training:** All employees will receive annual training on the whistleblowing policy, procedures, and the importance of reporting concerns.
 - **Ongoing Awareness:** Inflectra Corporation will regularly remind employees of the whistleblowing process through internal communications, including email newsletters, posters, and the employee handbook.
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6. Review and Improvement

The whistleblowing process will be reviewed annually to ensure that it is effective, and it will be updated as necessary to remain compliant with applicable laws and best practices.

Contact Information:

For more information or questions regarding the whistleblowing process, please contact:

- **HR/Compliance Department:** hr@inflectra.com
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This whistleblowing process helps Inflectra maintain high ethical standards, safeguard employees, and protect the company's reputation. All reports are taken seriously and will be handled in a respectful, professional manner.



Please let me know if you have any questions.

Regards

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

Adam Sandman

CEO, Inflectra Corporation