



Whistleblower Policy

WHISTLEBLOWER POLICY

This Whistleblower Policy is applicable to all Lone Wolf Technologies employees, contractors and other business associates on the premises or performing work for Lone Wolf Technologies who report a suspected violation of law or Lone Wolf Technologies' policies. This policy applies in the workplace and any work-related setting outside of the workplace.

PURPOSE

Lone Wolf technologies promotes prevention, detection and resolution of conduct that fails to comply with the law or Lone Wolf Technologies' policies. Violation of this policy may be subject to disciplinary measures up to and including termination.

WHISTLEBLOWER PROTECTION

Lone Wolf Technologies will use its best efforts to protect whistleblowers against retaliation. A whistleblower is an employee who informs a Lone Wolf Technologies manager or executive, HR, legal counsel of activity that the person believes to be in violation of the law or Lone Wolf Technologies' policies. Whistleblower complaints will only be shared with those who need to know so that Lone Wolf Technologies' can conduct an effective investigation to determine what action to take based on the results of any such investigation and in appropriate cases, with law enforcement personnel.

Employees of Lone Wolf Technologies may not retaliate against a whistleblower for informing management about an activity which that person believes in good faith to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may follow the procedures listed below. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Whistleblowers must be cautious to avoid baseless allegations made with reckless disregard for their truth or falsity or allegations made maliciously or not in good faith. Individuals making such allegations may be subject to disciplinary action by Lone Wolf Technologies.

Reporting Procedures

If an individual believes a violation of this policy has occurred, Lone Wolf Technologies will courteously treat any person who invokes the complaint procedure, and Lone Wolf Technologies will handle all complaints swiftly and confidentially. Lodging a complaint will not be used against the employee or have an adverse impact on the individual's employment status. Employees are strongly urged to use this procedure.

1. Complaints should be submitted as quickly as possible after an incident has occurred. Complaints can be submitted to your manager, any Lone Wolf Technologies manager or executive, HR, or via the United States Department of Labor anonymous reporting option.
 - a. Managers or executives who receive complaints of a possible incident must notify HR within 24 hours of receiving the complaint.
 - b. When HR receives a complaint that a violation of this policy may be occurring, they may notify management and will review the complaint with the company's legal counsel.



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1. HR will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
2. If necessary, the complainant and the respondent will be separated during the investigation, either through a remote work arrangement or administrative leave.
3. During the investigation, HR, legal counsel and/or management, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
4. Upon conclusion of an investigation, HR or other person conducting the investigation will submit a written report of their findings to legal counsel and/or appropriate management team. If it is determined that a violation of this policy has occurred, HR will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:
 - a. the severity, frequency and pervasiveness of the conduct;
 - b. prior complaints made by the complainant;
 - c. prior complaints made against the respondent; and
 - d. the quality of the evidence (e.g., firsthand knowledge, credible corroboration).
1. If the investigation is inconclusive or if it is determined that there has been no violation of policy, but potentially problematic conduct may have occurred, HR may recommend appropriate preventive action.
2. Management will review the investigative report and any statements submitted by the complainant or respondent, discuss the results of the investigation with HR and legal counsel and decide what action, if any, will be taken.
3. Once a final decision is made, management, HR and/or legal counsel will meet with the complainant and the respondent separately and notify them of the findings of the investigation.

RELATED LINKS/RESOURCES

- Contact humanresources@lwolf.com for any additional information or questions about this policy.
- U.S. Department of Labor's Whistleblower Complaint Reporting: www.whistleblowers.gov
- To report an emergency, fatality, or imminent life-threatening situation please call 9-1-1 then contact the U.S. Department of Labor's toll-free number: **1-800-321-OSHA (6742)**