

## WHISTLEBLOWER POLICY

### PURPOSE

Clarience Technologies, LLC (together with its subsidiaries, the “Company”) is committed to high standards of ethical, honest and legal business conduct. In line with this principle and our commitment to open communication, this policy provides an avenue for employees to bring to our attention illicit or illegal conduct and reassurance that they will be protected from reprisals for raising such concerns.

This policy is intended to cover protections for bringing to our attention questionable business conduct at the Company, such as:

- unethical business conduct or violations of company policies, including, but not limited to, the Company’s Code of Business Conduct and Ethics;
- questionable or irregular accounting methods, auditing conduct or financial reporting practices, including, without limitation: (i) fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company, or the recording and maintaining of financial records of the Company; (ii) deficiencies in, or noncompliance with, the Company’s internal accounting controls; (iii) misrepresentation or false statement to an executive or external auditor regarding a matter contained in the financial records, financial reports or audit reports of the Company; or (iv) deviation from full and fair reporting of the Company’s financial condition;
- activities that violate federal, regional, state, local, or other laws, including without limitation the Foreign Corrupt Practices Act of 1977 and other anti-corruption laws applicable to the Company’s operations;
- any other activities that are not consistent with our Code of Business Conduct and Ethics, other company policies, or our employee handbooks.

This policy applies to all employees of Clarience Technologies, LLC and its subsidiaries worldwide.

### POLICY

We encourage employees to immediately report concerns when they in good faith believe that any questionable conduct has occurred, is occurring, or is about to occur. Any employee who in good faith reports such incidents will be protected from threats of retaliation, discharge, compensation reductions or other discrimination. These reports will be treated as confidential to the full extent possible consistent with our need to investigate the report. In addition, no team member may be adversely affected because the team member refused to carry out a directive that he or she reasonably believed to constitute fraud or a violation of law. A team member who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, including termination. Reports made in bad faith or for malicious or improper purposes, however, may lead to discipline, including termination.

## REPORTING PROCEDURES

To facilitate the reporting of employee complaints, we have established the procedures below for the receipt, retention and treatment of concerns and complaints arising under our Code of Business Conduct and Ethics, other company policies, and employee handbooks. Submissions may be made by employees on a confidential, anonymous basis under these procedures. Employees may report violations and submit complaints as follows:

By telephone: 877 453 6651 (United States)  
0800 069 8021 (United Kingdom)  
800 099 1722 (Mexico)

By Internet: <https://clarience.ethicspoint.com>

As part of these procedures, you should be aware of the following:

- A. The earlier a concern is expressed, the easier it is to take action. To that end, employees are encouraged to bring concerns as soon as possible to their supervisor or a member of our Legal or Human Resources teams, or through any of the communication channels identified above. Although you are not expected to prove the truth of an allegation, you should be able to demonstrate that the report is being made in good faith with reasonable factual support.
- B. Concerns and complaints may be submitted on a confidential or anonymous basis. There may be times when more detailed information from the source of the information is needed to quickly and efficiently conduct a thorough investigation. Reports will be kept confidential to the extent possible, consistent with the need to conduct and conclude a thorough investigation.
- C. If an employee who reports a claim, or participates in the investigation of any reported claim, has reason to believe that he or she has been or will be discriminated against, retaliated against, or harassed, the employee should report those facts.
- D. This policy only applies to, and is intended only to encourage, allegations made in good faith with reasonable belief in the accuracy thereof.

## INVESTIGATIONS

All complaints under this policy will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct, conclude and, if appropriate, prosecute the investigation.

Our employees have a duty to cooperate promptly and to provide accurate information in connection with any investigation of claims reports, or of discrimination, retaliation or harassment resulting from the reporting or investigation of any such claims.

The specific action taken in a particular case will depend on the nature and gravity of the conduct or circumstances reported, and the facts proven by investigation.

Where questionable conduct has occurred, those matters will be corrected, and the persons responsible for the misconduct, or those failing to cooperate or who provide false information during an investigation, will be subject to disciplinary action, up to and including termination.

This policy is intended to encourage and enable employees to raise good faith concerns about questionable or illicit conduct to designated Company personnel prior to providing any notification outside the Company. However, nothing in this policy is intended to prevent an employee from reporting information to the appropriate governmental agency when the employee has reasonable cause to believe that a violation of law has occurred.

Adopted: July 20, 2020