

Anti-Retaliation Policy

Reporting Responsibility and Protection from Retaliation

The Company encourages everyone to come forward to report a problem and improper or unlawful activity without fear of any repercussions. Anyone who, in good faith, reports a violation to his/her supervisor, management, law enforcement, or other person should not fear harassment, retaliation, or any other consequence from doing so. Accordingly, the Company prohibits all forms of discrimination, harassment, retaliation, intimidation, interference, restraint, or coercion against any person who engages in protected activity, including without limitation, registering a complaint in good faith or serving as a witness on behalf of another employee. However, employees who submit false or malicious complaints, or fail to provide the truth or otherwise cooperate with Company investigations, shall be subject to disciplinary action and possible criminal prosecution.

Acts of retaliation should be reported immediately and will be promptly investigated and addressed. Retaliation is a serious violation. Individuals found to have engaged in any form of unlawful retaliation shall be subject to disciplinary action.

Should you choose to report suspected violations of law to a federal, state, or local governmental official, to counsel, or through filing a whistleblower or anti-retaliation lawsuit/proceeding, you may disclose trade secrets necessary to the report, but only if you maintain the confidentiality of trade secrets to the greatest extent possible by utilizing the most protective measure available or as otherwise required by the Defend Trade Secrets Act of 2016, 18 USC 1833(b) ("DTSA") (e.g., filing under seal, producing under a protective order for the court's eyes only, or disclosing only in confidential conversations not open to the public). Your disclosure of trade secrets without taking protective measures will result in the loss of any immunity otherwise granted, pursuant to the DTSA, in the process of disclosing trade secrets through a whistleblower or anti-retaliation lawsuit/proceeding.