

[Last Revised January 2022]

[Prepared by Legal and Compliance Department, Finance Department and HR Department]

GLOBAL EMPLOYEE HOTLINE POLICY

Related Policies:

Perimeter Solutions Business Conduct and Ethics Expectations

Purpose:

Perimeter Solutions is committed to the highest possible standards of ethical, moral and legal conduct. In conjunction with this commitment and Perimeter’s commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for submitting a complaint in good faith.

Scope:

This policy applies to Perimeter Solutions employees, including part time, temporary and contract employees.

A data privacy module has been implemented for reports from certain countries that are subject to data protection and privacy regulations. Please refer to the “Data Protection & Privacy Notice” made available on the hotline website.

Policy

The employee hotline policy is intended to cover serious concerns that could have a large impact on Perimeter Solutions, such as actions that:¹

- May lead to incorrect financial reporting;
- Are unlawful or in violation of applicable regulations;
- Are not in line with company policy, including the Code of Conduct and the Equal Employment Opportunity and Anti-Harassment Policy; or
- Otherwise amount to serious improper conduct.

Regular business matters should be directed to the employee’s supervisor and are not addressed by this policy.

¹ Types of reports may be restricted for certain countries that are subject to data protection and privacy regulations.

Anti-Retaliation Policy; Safeguards

Confidentiality

Perimeter Solutions takes the confidentiality of a reporter and the information he/she provides seriously. Every effort will be made to protect a reporter's identity by our hotline vendor and internally by Perimeter Solutions, whether or not a complaint is submitted anonymously or with details.

Information provided in a hotline report may be the basis of an internal and/or external investigation by Perimeter Solutions, and under certain circumstances, the information provided in a report including a reporter's identity may need to be disclosed to Perimeter Solutions employees, managers, directors and stakeholders or certain third parties (e.g. attorneys, auditors) during the course of an investigation. To the extent a disclosure is determined to be necessary, such disclosure will be as restrictive as possible and Perimeter Solutions will take precautions to make sure only those relevant and necessary to an investigation receive confidential information.

Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Note anonymous allegations may be more difficult to investigate given limitations on communications.

Malicious Allegations

Malicious allegations, or allegations not brought in good faith, may result in disciplinary action.

Procedure

Reporting:

The employee hotline procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

Web Intake Site: perimeter-solutions.ethicspoint.com

Mobile Intake Site: perimeter-solutions.navexone.com

Hotline:

Reports are submitted by Ethicspoint and may or may not be investigated at the sole discretion of Perimeter Solutions.

Country	Line Type	Dialing instructions
Australia	WWC	<ol style="list-style-type: none"> From an outside line dial the direct access number for your location: Australia (Optus).....1-800-551-155 Australia (Telstra).....1-800-881-011 At the English prompt dial 844-974-5084.
France	WWC	<ol style="list-style-type: none"> From an outside line dial the direct access number for your location: France (France Telecom).....0-800-99-0011 France (Paris Only).....0-800-99-0111 France.....0-800-99-1011 France.....0-800-99-1111 France.....0-800-99-1211 France (Telecom Development)....0805-701-288 At the English prompt dial 844-974-5084.
Germany	WWC	<ol style="list-style-type: none"> From an outside line dial the direct access number for your location: German.....0-800-225-5288 At the English prompt dial 844-974-5084.
Norway	WWC	<ol style="list-style-type: none"> From an outside line dial the direct access number for your location: Norway800-190-11 Norway (U.S. Military Bases).....800-199-11 At the English prompt dial 844-974-5084.
Spain	WWC	<ol style="list-style-type: none"> From an outside line dial the direct access number for your location: Spain.....900-99-0011 At the English prompt dial 844-974-5084.

Timing

The earlier a concern is expressed, the easier it is for us to take action.

Evidence

Although you are not expected to prove the truth of an allegation, the employee submitting a report should do their best to demonstrate in their hotline report that there are sufficient



grounds for concern. Statement should provide sufficient details, such as dates, applicable time periods, and any documentary or other evidence related to the complaint.

How the Report will be Handled

The action taken will depend on the nature of the concern. Legal and Compliance Department and the HR Department will receive a copy of each report and shall assign complaints to the relevant appropriate persons to investigate, if needed, and follow-up on actions taken by the Company. The Legal and Compliance Department or the HR Department, depending on the issue, may be required to investigate without any involvement from other persons. The CFO will have access to the system and will have the ability to view each report.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation. A resolution of an issue will be noted in EthicsPoint.

Upon review of the complaint, if the Legal and Compliance Department or the HR Department determine that an investigation is appropriate, they will assign the complaint to the appropriate responsible party to investigate the complaint. The investigation should be completed within 30 days, unless the responsible party, in communication with the Legal and Compliance Department or the HR Department, determine that a longer period is necessary. All such reports and investigations shall be kept confidential and shall be overseen by the Legal and Compliance Department to follow such confidentiality procedures.

Any employees that are a subject of a complaint cannot be part of the investigation process. To the extent the Legal and Compliance Department, the HR Department or the Finance Department employees are named in a complaint, such complaints may be handled by outside service providers. Any employee that is the subject matter of a complaint will not be informed of the investigation process and may receive a report regarding the resolution of a complaint at the end of the investigation process.

Investigation Report

An investigation into a complaint shall follow the format attached hereto as Annex A. Such investigation report shall be filed within EthicsPoint.

After the conclusion of the investigation, the responsible party, in discussion with the Legal and Compliance Department or the HR Department and/or the Finance Department, if appropriate, will review the investigation and determine whether a complaint can be closed, whether there are further follow ups, remedial or other actions necessary. In certain circumstances, further disclosure, including disclosure to the company's stakeholders, may be necessary.

Feedback to Reporter

The individual submitting a report will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the individual submitting a report and the department investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

Outcome of an Investigation

At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.



Annex A:

Confidential Investigation Report

Please complete investigation within 30 days from receipt. If such deadline cannot be met, please consult with the Legal and Compliance Department.

Department:	
Allegation/Issue (Include issue reference number from EthicsPoint)	
Type of Investigation e.g. Disciplinary/Grievance etc.	
Name/Post of employee(s) subject to investigation	
Name of complainant (if appropriate)	
Investigator (s)	

Background
This may cover: <ul style="list-style-type: none">• How did the issue come to light?• Have any other actions been taken prior to the investigation?
Remit Of The Investigation
This may cover: <ul style="list-style-type: none">• What specific allegations/concerns (by bullet points) were investigated?
Investigation Process
This may cover: <ul style="list-style-type: none">• A brief description of method(s) used to gather information• A record of what interviews/statements were undertaken and documents reviewed
Witnesses
<ul style="list-style-type: none">• List of witnesses interviewed
Findings
This should cover: <ul style="list-style-type: none">• A summary of findings and observations for each specific allegation/issue of concern investigated, cross-referencing any documentation where needed
Conclusions
This may cover: <ul style="list-style-type: none">• For each concern/allegation investigated an overall opinion based 'on the balance of probabilities' on whether there is evidence to support allegations made• Recommendations on whether further actions under the relevant employment procedure should be taken
Appendices
<ul style="list-style-type: none">• These should be attached and may include witness statements, investigatory interview notes, chronology of events etc.



Signed by Investigating Officer	
Date	

