

Confidential Reporting and Anti-Retaliation Policy



May 10, 2022

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I. Purpose and Scope

project44 is committed to ensuring an environment that supports open and honest communication. As part of that commitment, project44 has created channels and processes where team members can report concerns of questionable or unethical behavior, without fear of retaliation, and with confidence that those concerns will be appropriately addressed, and any deficiencies remediated. This Policy, in conjunction with other project44 policies and procedures, provides specific guidance regarding project44's confidential reporting and anti-retaliation commitments.

II. Confidential Reporting and Internal Investigations

1. Retaliation is Prohibited

project44 prohibits retaliation against anyone who reports, or participates in an investigation of, a possible violation of project44's Code of Conduct, policies or procedures, or the law. project44 also prohibits retaliation against team members who refuse to participate in suspected improper or wrongful activity.

This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, as well as being subjected to a hostile or intimidating work environment.

project44 prohibits retaliation even if the concerns raised are not confirmed following an investigation. However, an employee may be subject to adverse action if the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

This Policy does not exempt employees from the consequences of their own misconduct or inadequate performance, even if self-reported. This Policy also does not prevent project44 from managing employee performance and addressing conduct issues after an employee has reported an issue, so long as the report is not the reason for the performance management.

2. Confidentiality of Reports

project44 will maintain the confidentiality of anyone who reports or participates in an investigation of a possible violation of project44's Code of Conduct, policies or procedures, or the law. In some circumstances, a reporter's identity, and details of the report, may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide implicated individuals their legal rights of defense. In those circumstances, disclosure will be limited to only those to whom disclosure is required, and only so much information as is required, in order for project44 to comply with its legal, regulatory and policy obligations.

3. Commitment to Responding Appropriately

project44 is committed to appropriately responding to all reports of violations or potential violations of project44's Code of Conduct, policies or procedures or the law. project44's response can include management initiatives, counseling, mediation, audits and investigations, and remedial measures such as policy improvements, training, monitoring and discipline.

In every instance where a violation of project44's Code of Conduct, policies or procedures or the law is found to have occurred, project44 will take appropriate action, up to and including termination of employees found to have engaged in the violation.

Reports can be made to your manager or department head, the Chief People Officer or your human resource business partner, any member of the Legal department, or through the Ethics Helpline. While project44 encourages team members to raise issues internally through these reporting channels, the anti-retaliation commitments of this Policy also cover reports made to a government agency.

project44 will maintain communication with those who report a possible violation of project44's Code of Conduct, policies or procedures, or the law. Reports made directly through the Chief People Officer or your human resource business partner, any member of the Legal department, or through the Ethics Helpline will be acknowledged within 1-2 business days of receipt. To the extent allowed by law, and consistent with other privacy and confidentiality requirements and best practices related to investigations and employment practices, updates will be provided to Reporters.

4. Expectation to Report and Cooperate

All project44 team members are expected to promptly report potential violations of project44's Code of Conduct, policies or procedures, or the law, to fully cooperate with investigations into reports of misconduct, and to be truthful and forthcoming during the course of investigations and related inquiries.

Reports should be made to the Chief Compliance Officer, Chief People Officer, or through the project44 Ethics Helpline, as well as other additional channels that may be designated. Where allowed by law, reports can be made anonymously.

Subject to local laws and the terms of any collective bargaining agreements, failure to promptly report improper behavior, knowingly making a false report, or failing to fully cooperate with an investigation may be grounds for disciplinary action.

III. Roles & Responsibilities

Human Resources – responsible for supporting investigations of reports of violations or potential violations of project44's Code of Conduct, policies or procedures or the law.

Legal – responsible for management of investigations program for reports of violations or potential violations of project44’s Code of Conduct, policies or procedures or the law and ensuring that appropriate action is taken when a violation is found. Also responsible for the management of the project44 Ethics Helpline.

IV. Definitions & References

Code of Conduct	project44’s Code of Conduct, as amended from time to time.
team member	Any individual working full-time or part-time for project44 either directly or through an Employee of Record or vendor.
Ethics Helpline	The toll-free phone line and website available to project44’s team members for the purpose of reporting suspected violations of law and project44’s policies, and to ask questions about compliance-related issues. All Reports made through the Helpline are automatically documented in the case management system.
Reports	Credible allegations that, if true, would constitute a violation of project44’s Code of Conduct, policies, law or applicable regulation.

V. Policy Tracking

Tracking Item	Detail
Policy Name	Confidential Reporting and Anti-Retaliation Policy
Policy Owner & Title	Jennifer Coyne, General Counsel and Chief Compliance Officer
Department	Legal
Initial In Force Date	May 10, 2022
Applies To	All project44 team members

Revision History

Version	Review Date	Reviewed By	Title	Description of Changes
1.0	May 10, 2022	Policy Management Committee	N/A	Initial Policy

Approval

Version	Approval Date	Approved By	Title
1.0	May 10, 2022	Policy Management Committee	Jennifer Coyne, Chair, Policy Management Committee

Related Policies and Procedures	
Code of Conduct	
Investigations Policy and Procedures	
Acceptable Use Policy	