VideoAmp Complaint And Investigation Policy

Effective: 02.22.23

I. Introduction/Purpose

The Complaint and Investigation Policy sets forth the process for VideoAmp employees and suppliers to raise workplace issues, complaints, and concerns.

This Policy is designed to ensure Company compliance with Federal and state laws and regulations and documents Company policy regarding complaint handling, investigations, and tracking. This Policy is not intended to incorporate every detail of processes outlined in the Company’s various internal procedures maintained separately by each business unit or department; accordingly, this Policy supersedes any conflicting procedures. This Policy applies to all complaints, including complaints received from any employee, vendor, third-party, regulatory agency, plans and plan participants, or anyone writing on their behalf, including verbal complaints.

The Policy requires that all complaints be investigated and responded to on a timely basis. Failure to comply with this Policy can result in penalties, fines, reputational harm, litigation and/or the loss of business. This Policy provides procedures for the routing, investigation, and tracking of incoming complaints from receipt to response and resolution, as well as regulatory and executive management complaint reporting.

The Company will appropriately investigate all claims of misconduct or wrongdoing brought to its attention, regardless of how the issue is reported, and will take appropriate steps (disciplinary or otherwise) to address violations or other issues arising as a result of an investigation. The nature and scope of an investigation will be determined by its lead investigator and/or the investigation team.

The Company may choose not to conduct an investigation when:

- A report of alleged misconduct was made in bad faith;
- The allegations, even if true, would not be a violation of law or the Company’s values or policies;
- The material facts are not in dispute and no other facts are necessary to resolve the issue; or
- Initial inquiries fail to confirm that the incident may have occurred or that there is no factual basis to believe misconduct occurred.

II. Making Complaints And Reporting Violations

Company employees are required to promptly report all known and suspected violations of Company policy or law (including without limitation actions that may be illegal, dishonest or unethical) to their manager, another manager, the People Department, or the Legal Department and to thereafter cooperate in any subsequent investigation. This obligation includes violations alleged in formal or informal information, complaints, or reports received from persons inside or outside of the Company. An employee who refuses to cooperate with an investigation or knowingly provides false information regarding the original complaint or the investigation may be subject to disciplinary action up to and including termination of employment.
Managers and supervisors who receive a report pursuant to this policy have a responsibility to promptly notify the People Department or Legal Department. Managers and supervisors must cooperate in the investigation and implement corrective actions when appropriate.

Employees are free to bring any concern to any level of management, the People Department, or the Legal Department the employee believes is best able to address the issue fairly.

If an employee is not comfortable discussing the suspected violation or complaint with a manager, the Legal Department, or the People Department, the suspected violation may be reported through the following means, including submission of an anonymous report:

- By calling the Company compliance hotline
  - In the United States: 1.844.539.2376
  - In Singapore
    - Starhub: 1.800.001.0001 then at English prompt: 844.539.2376
    - SingTel: 1.800.011.1111 then at English prompt: 844.539.2376
- By letter or email addressed to the Company’s Chief People Officer or Chief Legal Officer

If an employee wishes to report anonymously, the employee should take appropriate steps to ensure anonymity is maintained. Keep in mind that in any investigation following a complaint or report of a suspected violation, the Company may not be able to maintain anonymity. However, all available appropriate measures will be taken. Any anonymous report will be directed to the appropriate department for investigation and handling.

Any reports made, whether anonymous or not, should include as much detail as possible in order to allow the Company to investigate the matter appropriately. Important details may include, for example, the names of the people involved in or witnesses to the incident(s), the dates and times of the incident(s) (approximate or exact), where the incident(s) occurred, and why the person believes the incident(s) should be reported. Insufficient detail may result in an inability for the Company to address the matter appropriately.

Any employee who believes that they may have been personally involved in misconduct or a policy violation is still expected to report such incidents. Self-reporting will be considered when deciding whether or what disciplinary action is appropriate.

Please note that if an employee chooses to make a report using any of the methods set forth above, the Company may need to process the employee’s personal data pursuant to applicable law in order to investigate the report and meet any regulatory requirements, if necessary.

III. Conducting The Investigation

While not always necessary, at the outset of an investigation, the Legal Department may request that the investigation be conducted under the attorney-client privilege for the purpose of providing legal advice to the Company or under the work product doctrine to further the attorney-client privilege for the purpose of anticipated litigation or seeking legal advice. The Legal Department will be involved in and direct all
investigations conducted under these privileges whether these investigations involve secondary investigating parties or outside counsel.

To enable a thorough and consistent approach, Company investigations, regardless of the initial reporting channel, will be led by the People Department, the Legal Department, or other department as the primary investigator as set forth below:

<table>
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<tr>
<th>Primary Investigator</th>
<th>Allegation Category</th>
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<tbody>
<tr>
<td>People Team</td>
<td>• Employee Relations</td>
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<td>o Workplace misconduct</td>
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<td>o Discrimination/harassment</td>
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<td>o Wage and Hour/Time</td>
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<td>o Misuse of company equipment</td>
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<td>• Physical security breaches</td>
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<td>• Environmental, Safety and Health</td>
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<td>o Product Safety concerns</td>
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<td>o Serious injuries or fatalities</td>
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<td>o Unsafe working conditions</td>
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<td>• Regulatory violations</td>
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<tr>
<td>Legal</td>
<td>• Matters requiring escalation, as described below</td>
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<td></td>
<td>• Code of Conduct</td>
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<td></td>
<td>o Conflicts of Interest</td>
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<td>o Breach of Confidential Information</td>
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<td>• Gifts and entertainment</td>
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<td>• Legal and Regulatory Issues</td>
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<td>o Foreign Corrupt Practices Act; Bribery; Corruption</td>
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<td>o Global Trade Compliance</td>
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<td>o Insider Trading</td>
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<td>o Antitrust/anti-competition</td>
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<td>o Government contracting</td>
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<td>o Pricing/bidding/discounts</td>
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<td>Information Technology</td>
<td>• Data Breach</td>
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<td>• Breach of confidential information</td>
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<td>• Data privacy violations</td>
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<td>• Information security compromises</td>
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An independent third-party will serve as the secondary investigator for all allegations involving fraud, accounting irregularities, failure of financial controls, and conflicts of interest.

The Company will investigate the facts to determine objectively what happened and whether a violation occurred. All investigators will treat witnesses in a professional manner, with dignity and respect.
All claims received from external sources reporting misconduct or Company policy violations, such as claims from or on behalf of former employees, claims by a federal, state, or local agency, or claims by attorneys, must be referred to the People or Legal Department as noted above and as promptly as possible.

When a person is assigned to investigate a matter, they should have no interest in the outcome of a case. Investigations will be handled in a manner to avoid an actual or perceived conflict of interest. Complaints that involve allegations about the conduct of the Chief Executive Officer, President, an Executive or Senior Vice President, Director-level employee, the People Department, and/or the Legal Department may be referred to an independent third-party investigator. Any witness who believes that the investigator in a particular matter has a conflict of interest or bias should raise the issue to the appropriate investigating department.

IV. Matters Requiring Escalation

Certain allegations must be immediately elevated to the Legal Department to provide consistent, independent investigation of these matters. Such matters include:

- Egregious, deliberate, or willful attempts to circumvent normal procedures or controls;
- Falsification of the company’s financial records;
- Investigations that could have negative public relations impact for the Company;
- Offering, paying, or accepting bribes or kickbacks to secure business;
- Potential violations of the Code of Business Conduct and Ethics or other Company policies by a director, officer or other senior employee;

V. Policy of Non-Retaliation

It is against Company policy, and in some jurisdictions, it is unlawful, for anyone to retaliate against any person because that person provides truthful information to the Company, law enforcement or regulatory official concerning such person’s reasonable good faith belief that a possible violation of any Company policy, or federal, state, or other law has occurred. The Company will not permit and does not tolerate any form of intimidation or retaliation by any employee, contractor, subcontractor, or agent of the Company against any employee who:

- provides information, causes information to be provided, or otherwise assists in an investigation regarding any conduct which the employee or contractor reasonably and in good faith believes constitutes a violation of laws, rules, regulations, or any Company policies; or
- files, causes to be filed, testifies, participates in, or otherwise assists in a proceeding filed or about to be filed relating to a violation of any law, rule, or regulation, or any Company policies.

The prohibited forms of intimidation or retaliation include, but are not limited to, discharge, demotion, suspension, failure to hire or rehire, denial of overtime or promotions, reduction of pay or hours, threats, intimidation, harassment, or any other manner of discrimination with respect to an employee’s or contractor’s terms or conditions of employment/relationship with the Company based on lawful actions of such employee or contractor with respect to a good faith report or cooperation or assistance with an investigation conducted by the Company.
VI. Statement of Confidentiality

In cases in which an employee reports a suspected violation in good faith and is not personally engaged in the reported conduct, the Company will attempt to keep its discussions and actions confidential to the greatest extent possible and in compliance with its policies, applicable laws and regulations governing employee/contractor privacy and anonymity. All reports and records associated with complaints or reports made under this Policy are considered Company confidential information, to the extent permitted by applicable law, and access will be restricted to members of the Board of Directors, the Company’s internal and external legal counsel, applicable employees in the People Department and others involved in investigating a complaint or report under this Policy. Access to reports and records may be granted to other parties at the discretion of the responsible investigating department or the Legal Department. If you have questions about the confidentiality policy, including whether certain information can be disclosed, please contact the Legal Department.

VII. Investigation and Reports

Company personnel should not independently conduct their own investigations but instead should follow the procedures set forth in this Policy. The applicable and appropriate department as designated above will be responsible for coordination of the prompt investigation and resolution of all complaints and reports of violations and ensuring that corrective action, as necessary and appropriate, is taken. All reports of suspected violations will be reviewed, investigated, and evaluated by the applicable and appropriate department as deemed reasonably necessary.

The investigating department will report on the nature of all complaints and reports of violation received in connection thereto to the Chief Executive Officer, Board of Directors, or person designated by the Board. Such reports will be made and updated as requested and/or required by the nature of the complaint, its severity, and other circumstances.

The need for an investigation may be triggered by a formal complaint or report, or other actions, such as accusations of wrongdoing, management observation, reason to know or suspect certain conduct, injury or illness, suspected substance abuse, threats, vandalism, sabotage, theft, violation of work rules or policies, regulatory or government agency charges or investigations, attorney letters or demands, and formal legal complaints.

Investigations are also required under certain laws, statutes, and regulations. These include federal and state discrimination laws, federal and state Occupational Safety and Health Administrations, Drug Free Work Act requirements, Sarbanes Oxley Act, various securities acts, Department of Transportation regulations, and the Health Insurance Portability and Accountability Act.

All investigations should be commenced immediately, with specific goals, objectives. Information Technology should be contacted at the commencement of the investigation to ensure all relevant documents and information are preserved and available.

At the conclusion of the investigation, if the investigating department finds that a policy violation or other misconduct occurred, the investigator will make recommendations based upon a root cause analysis, such as disciplinary action or enhancements to the Company’s controls, through the appropriate channels.
When the recommendation includes employee discipline, the investigator will provide the recommendation to the employee’s supervisor and/or management who will make the final decision.

Anyone, regardless of position or title, whom the Company determines has engaged in misconduct or other Company policy violation may be subject to disciplinary action, up to and including termination of employment at the discretion of the Company. In addition, the Company reserves the right to pursue criminal and/or civil action(s) for wrongdoing where appropriate.

VIII. Retention of Records

The investigating department will maintain a log of all complaints and reports, tracking their receipt, investigation, and resolution. The investigating department will collect and maintain such other records as deemed reasonably necessary. The Company will preserve records of complaints and reports made under this Policy and associated log(s) and investigative records for a period of time to be determined by the investigating department as appropriate.

IX. Roles and Responsibilities

a. The Legal Department and the People Department will serve as the primary investigative departments for matters as described in this Policy.

b. The Legal Department must be involved if the investigation is to be conducted under attorney-client privilege or if outside counsel needs to be engaged to investigate allegations of misconduct.

c. The People Department must be involved in all instances where disciplinary action is considered as a response to an investigation.

d. An independent third party will serve as a secondary supporting investigative party on matters involving allegations of fraud, accounting irregularities, failure of financial controls and conflicts of interest.

e. Information Technology will provide support for corporate investigations where access to electronic resources is necessary.

f. Management (supervisors, managers or the employee’s reporting chain) is responsible for assisting in the investigation as needed such as providing access to witnesses, documents and facilities for the investigation team. Management is also responsible for making any decisions with respect to discipline after consulting the People Department and Legal Department as appropriate.

g. The Chief People Officer or Chief Legal Officer must promptly notify the CEO in writing of all reports of workplace issues, complaints, and concerns that are submitted hereunder.