

SPEAK UP POLICY

Firefly is committed to open reporting as a core pillar of our culture of fairness, integrity and respect for each other, our values and the law. We ask questions, seek guidance and voice concerns when we are unsure about a situation or behavior. By speaking up, we can make Firefly even stronger as a workplace and business.

Your Voice Matters

- ❖ Firefly promotes a speak up culture where we value the help of individuals who speak up when they see something they believe may violate a law or Firefly policy.
- ❖ Firefly expects employees to promptly ask questions, seek guidance and voice concerns through any of its speak up resources.
- ❖ Employees do not have to be certain a violation occurred, just a good faith belief.
- ❖ Employees are expected to fully cooperate in fact-finding reviews and answer all questions completely and honestly, including providing requested documents.

No Retaliation & Confidentiality

Firefly never tolerates retaliation against anyone who voices a concern or participates in a fact-finding review.

- ❖ If you suspect retaliation against you or a fellow Firefly, promptly report it.
- ❖ If you participate in a fact-finding review or otherwise learn of someone who has voiced a concern, do not change your communication practices or behavior in a way that would negatively impact the individual.

All reports are confidential and are shared only on a need-to-know basis. You can help us protect confidentiality by not discussing this with your fellow Fireflies or anyone.

Speak Up Resources

Ask questions, seek guidance, and voice concerns through any of these resources:

- ❖ Supervisor or other member of management
- ❖ Human Resources
- ❖ Environmental, Health and Safety
- ❖ Legal Department
- ❖ Chief Ethics and Compliance Officer
- ❖ Firefly Speak Up Helpline

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Firefly Speak Up Helpline

Firefly's Speak Up Helpline is a confidential, third-party service available 24 hours a day, 7 days a week. You can voice a concern or question, anonymously, if you choose.

- ❖ Call: 833-416-6259 Toll-Free
- ❖ Visit: <https://firefly.ethicspoint.com>
- ❖ Access: QR Code via Mobile Phone



You will receive a 'report key' (along with your passcode) that you can use to provide additional information and to receive questions and/or feedback from Firefly.

Fact-Finding Review

Firefly thoroughly investigates every report. As part of the process, Firefly:

- ❖ Conducts an independent and objective fact-finding review;
- ❖ Obtains the facts through interviews and/or review of documents and materials;
- ❖ Determines findings, whenever possible from the facts that are obtained;
- ❖ Implements corrective and/or continuous improvement actions, as appropriate, to improve our workplace;
- ❖ Provides feedback to the individual who voiced the concern, while maintaining confidentiality and privacy of those involved; and
- ❖ Follows up, as appropriate, to ensure there is no retaliation and the report is resolved.

Supervisor and Manager Responsibilities

If a concern is reported directly to you, promptly notify Human Resources, Legal or Compliance within 2 days, so that a fact-finding review can be conducted.

Consequences for Violations

Employees who violate Firefly policies may be subject to disciplinary action up to and including termination of employment. Violations of law could cause serious consequences, including reputational damage to Firefly and individual employees, as well as significant financial penalties, criminal penalties (fines and jail), and loss of business with commercial and government customers.