

# LOOP LLC

Policy Name:	Non-Retaliation Policy	Effective Date:	9/28/2020
Section of:	Personnel Policy Manual	Review Frequency:	Triennially
Location:	<a href="http://loopmoss/Company/Policies and Procedures/">http://loopmoss/Company/Policies and Procedures/</a>	Target Audience:	All Employees

LOOP LLC is hereinafter referred to as "the Company."

## **1.0 Overview**

The Company maintains an effective Non-Retaliation Policy (the "Policy") to support a business culture free from retaliation and retribution for the reporting of unethical or illegal behavior or conditions, participation in any protected activities, or participating in investigations concerning matters of unethical or illegal conduct.

## **2.0 Purpose**

The Company provides a workplace where employees and Associated Individuals are encouraged to engage in Protected Activities and report business integrity concerns without fear of retaliation or retribution.

The Company remains committed to a culture that promotes adherence to all laws, regulations, rules, and Company policies and standards, including the Code of Business Conduct and this Policy (together, "Rules"). The Company's Business Integrity Program (BI Program) and Rules ensure that the Company effectively prevents, detects, and resolves conduct that violates these Rules.

The Company encourages all Associated Individuals to express concerns and to report any known or suspected violation of any Rules.

## **3.0 Scope**

This Policy applies to all Company employees and other Associated Individuals.

## **4.0 Policy**

### **A. Reporting Obligations**

Employees who have Good Faith knowledge of actual or suspected wrongdoing, noncompliance, misconduct, or violations of Rules, are expected to immediately report the concern to a member of the Company's:

1. Executive Team,
2. Human Resources Department,
3. Legal Department, or
4. Business Integrity Office.

Violations of this policy may also be reported anonymously via the Business Integrity Portal:

1. Web intake at <https://www.loopllc.com/LOOP-Social-Contract/Business-Integrity>
2. Telephone at 844-235-7409 or
3. Mobile device using QR Code



## **B. Non-Retaliation**

The Company prohibits any employee or Associated Individual, regardless of title, from engaging in retaliation, retribution, or any form of harassment against another employee or Associated Individual for the reporting of BI concerns pursuant to the Ethics and Business Integrity Program or for an employee engaging in a Protected Activity (as that term is described below). All forms of unlawful retaliation are prohibited, including any form of discipline, reprisal, intimidation, or other form of retaliation for participating in any activity protected by law or by this Policy.

## **C. Issue Handling**

All reports will be reviewed in a timely manner and reporters will remain confidential at all times insofar as legal and practicable. The Company will disclose or provide reported information on a strict need-to-know basis.

Supervisors and Managers who receive reports under this Policy shall immediately report to the Chief Compliance Officer all compliance issues as well as actions taken in response to such reports as soon as possible, but no later than five (5) business days after the date of the initial report.

## **5.0 Enforcement**

The Company will not tolerate any form of direct or indirect retaliation that arises from the Good Faith reporting of suspected illegal or unethical conduct or cooperating with an investigation. Reporters will be protected even if a concern turns out to be unsubstantiated. However, employees cannot exempt themselves from the consequences of wrongdoing by self-reporting unlawful behavior or violations of LOOP policies, although self-reporting may be taken into account by LOOP in determining the appropriate course of disciplinary action.

Any employee determined to have engaged in a violation of this Policy will be subject to discipline, up to and including termination of employment. An employee who is determined to have knowingly made a false accusation or given false information during an investigation may be subject to disciplinary action, up to and including termination.

A copy of the Policy must be available to all employees.

## **6.0 Definitions**

“Associated Individuals” refers to Company consultants, contractors, and other associated individuals.

“Good Faith” refers to reporting information that is free of malice and believed to be true, even if it is later determined to be mistaken.

“Management” refers to any employee that has responsibility for directing the work of or managing one or more employees.

“Protected Activity” refers to an Associated Individual’s Good Faith reporting of actual or suspected unethical or illegal behavior or conditions, participation in any investigation concerning matters of unethical or illegal conduct, or other actions protected by law or regulation.

“Retaliation” involves any conduct that punishes or is intended to punish or otherwise disadvantage any employee for the Good Faith reporting of misconduct or participating in any Protected Activity. Retaliation can take many forms, including conduct or written communication, verbal or nonverbal behaviors, actual or implied threats, unlawful changes to the terms or conditions of employment or contract, harassment, bullying, intimidation or deliberate exclusionary behaviors.

**7.0 Roles and Responsibilities**

<b>ROLE</b>	<b>FUNCTIONAL RESPONSIBILITIES</b>
Business Integrity Office	Policy Ownership
Human Resources	Discipline

**8.0 Re-Issue/Revision History**

<b>Review Initiated Date</b>	<b>Subject Matter Review By/Date</b>	<b>Executive Review By/Date</b>	<b>Re-Issue /Revised Policy Effective Date</b>
8/25/2020	SBR - 8/26/2020	MCG - 9/10/20	9/28/2020

**9.0 Related Policies, Procedures, and Documents**

LOOP Code of Business Conduct

LOOP Personnel Policy Manual

**10.0 Policy Signoff**

**Approved:**

Mark C. Garrison

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Chief Compliance Officer

Eugene A. Priestley

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Director, Human Resources, Regulatory, Safety and Security