



NEWFIELDS WHISTLEBLOWER PROTECTION POLICY

POLICY OBJECTIVE

NewFields is committed to conducting its business with honesty and integrity at all times. Therefore, it is NewFields' policy to ensure that when a person (the “**whistleblower**”) has reasonable grounds to believe that a NewFields Team Member has committed or is about to commit an illegal action, a violation of NewFields Policy, or other unethical behavior, the whistleblower has an avenue to report such wrongdoing without fear of retaliation.

This policy has been implemented to:

1. encourage NewFields Team Members to disclose wrongdoing,
2. protect the whistleblower from reprisal,
3. treat all parties to an investigation in a fair and equitable manner,
4. ensure confidentiality as much as possible, and
5. take corrective and disciplinary action if wrongdoing is discovered.

POLICY SCOPE

This Whistleblower Protection Policy applies to NewFields Companies, LLC together with its subsidiaries and affiliates worldwide (collectively “NewFields” or the “Company”). This policy also applies to all NewFields members/partners, employees, and officers, as well as any parties having a contractual relationship with NewFields (“Team Members.”)

WHISTLEBLOWER POLICY

If a NewFields Team Member has knowledge of illegal or unethical activity by another Team Member or a client, s/he should report it to the NewFields Legal Department or the NewFields Ethics Committee¹. NewFields Legal Department and/or Ethics Committee will investigate all allegations of wrongdoing. Any Team Member who makes such a report in good faith or who participates in an investigation may not be dismissed, demoted, suspended, threatened, harassed, or otherwise discriminated against.

All reports will be treated in a confidential and sensitive manner. NewFields Legal Department and/or Ethics Committee will make every effort to keep the identity of the reporting Team Member anonymous, except where the nature of the disclosure or resulting investigation makes it necessary to disclose his or her identity (i.e. judicial proceedings).

Any Team Member found to have retaliated against an individual who makes a good faith report of alleged wrongful activity or for participating in an investigation of allegations of misconduct will be subject to appropriate

¹ As of the date of this policy, NewFields' Ethics Committee is comprised of Jennifer Rosenberg, Vasheta Brown, Jairrid Zellner and Toni Wynn.



disciplinary action, up to and including termination of employment. Any reports of alleged retaliation against a whistleblower should be reported to NewFields Legal Department or the Ethics Committee.

Any Team Member who knowingly makes a false report of wrongdoing will *not* be protected by this policy and will be subject to appropriate disciplinary action, up to and including termination of employment.

WHISTLEBLOWER PROTECTIONS FOR U.S. GOVERNMENT CONTRACTOR EMPLOYEES

Some NewFields entities are contracted or subcontracted to perform work for the federal government. Employees of those entities are entitled to protection against retaliation for making a “protected disclosure.” The Whistleblower Protection Act (10 U.S.C. §2409) and regulations set forth in FAR Part 3.9 and DFARS Part 203.9 prohibit federal contractors from discharging, demoting, or otherwise discriminating against an employee as a reprisal for disclosing information that the employee reasonably believes is evidence of:

1. gross mismanagement of a federal contract or grant,
2. gross waste of federal funds,
3. abuse of authority related to a federal contract,
4. substantial and specific danger to public health or safety, or
5. a violation of law, rule, or regulation related to a federal contract (including the competition for or negotiation of a contract).

A disclosure of wrongdoing under a federal contract must be made to a person or entity that is authorized to receive it. This includes:

1. a member of Congress or a representative of a committee of Congress,
2. an Inspector General,
3. the Government Accountability Office,
4. a federal employee responsible for contract or grant oversight or management of the relevant agency,
5. an authorized official of the Department of Justice or other law enforcement agency,
6. a court or grand jury, or
7. a management official or other employee of the contractor or subcontractor who has the responsibility to investigate, discover or address misconduct (this would include members of NewFields Legal Department or Ethics Committee).

An online reporting tool and additional resources can be found at www.oversight.gov/whistleblowers.

An employee who initiates or provides evidence of contractor or subcontractor misconduct in any judicial or administrative proceeding relating to fraud, waste or abuse of a federal contract shall be deemed to have made such a disclosure.

Any contractor employee who believes that s/he has been discharged, demoted, or otherwise discriminated against contrary to this policy and/or federal regulations may file a complaint with the Inspector General of the agency concerned using the reporting tool noted above.

NewFields shall flow down these requirements to its subcontractors as required by the Federal Acquisition Regulations or NewFields client contracts.



OWNER

The Owner of this Whistleblower Protection Policy is NewFields' Legal Department.

APPROVALS

Approved this 7th day of December, 2021.

Patrick C. Gobb
Chief Executive Officer