



WHISTLEBLOWER POLICY AND MANDATORY DISCLOSURE

OVERVIEW

At Shore Solutions, Inc. (“the Company”), we are guided by our company core values. These values are the foundation of how we conduct ourselves and interact with each other, our customers, and suppliers. The Company is committed to ensuring compliance and promoting ethical culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

PURPOSE

The policy has been put in place to ensure any concerns raised regarding any misconduct in relation to the Company’s business are dealt with effectiveness, security, and appropriateness. The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable Conduct involving the Company’s business and provides protections and measures to individuals who disclose in relation to such Conduct without fear of victimization or reprisal. This policy will be provided to all team members and management of the Company upon commencement of employment or engagement.

SCOPE

This policy applies to any person who is, or has been, any of the following with respect to the Company:

- Employee;
- Officer;
- Director;
- Contractor (including sub-contractors and employees of contractors); Supplier (including employees of suppliers);
- Consultant; Auditor; Associate; and
- Relative, dependent, spouse, or dependent of a spouse of any of the above.

REPORTABLE CONDUCT

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company officer, vice president, director, employee, contractor, supplier, consultant, or other person who has business dealings with the Company has engaged in Conduct (Reportable Conduct) which is:

- Dishonest, fraudulent, or corrupt;
- Unethical including any breach of the Company’s policies such as the Code of Business Ethics and Conduct; Oppressive or grossly negligent;
- Potentially damaging to the Company, customers, its employees or a third party; misconduct or an improper state of affairs;
- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence, and criminal damage to property);



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MAKING A DISCLOSURE (MANDATORY)

The Company relies on its employees maintaining a culture of honest and ethical behavior. Accordingly, if you become aware of any Reportable Conduct, you must disclose this policy. There are several ways to report or disclose any issue or behavior you consider to be Reportable Conduct.

➤ Internal Reporting

You may disclose any Reportable Conduct to the Vice President of Contracting and Compliance:

- Dalcia Paramo
- Office: 619-434-2775 Ext. 104 / Mobil: 619-829-2700
- Email: compliance@shoresolutions.com

You are also encouraged to contact the above point of contact to obtain any additional information you may require before making a disclosure or for any clarification regarding this policy.

If you cannot use the above reporting channel, a disclosure can be made to an “eligible recipient” within the Company. Eligible recipients include:

Director of Operations

- Graham Burkey
- Office: 619-434-2775 Ext. 117 / Mobil: 619-996-4897
- DOO@shoresolutions.com

The above-referenced points of contact will safeguard your interests and will ensure the integrity of the reporting mechanism.

➤ External Reporting

Where you do not feel comfortable making an internal report, or where you have made an internal report, but no action has been taken within a reasonable time, you may disclose any Reportable Conduct to the DOD Inspector General using any of the following methods:

- dodig.mil/hotline
- (800) 424-9098 (Toll-free)

The office of the DoD Inspector General provides a reliable, confidential means to report violations of law, rule or regulation, fraud, waste, abuse, mismanagement, trafficking in persons, serious security incidents, or other criminal or administrative misconduct that involve DoD personnel and operations, without fear of reprisal.

➤ Anonymity

When making a disclosure, you may do so anonymously. It may be difficult for the Company to investigate matters disclosed in a report submitted anonymously correctly; therefore, the Company encourages you to share your identity when making a disclosure. However, you are not required to do so.

When a disclosure has been made externally, and you provide your contact details, your contact details will only be provided to the internal company point of contact with your consent.





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INVESTIGATION

The Company will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Vice President of Contracting and Compliance will investigate the matter and take the actions required immediately. All investigations will be conducted in a fair, independent, and timely manner, and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the Company's internal point of contact will contact you by your preferred method of communication to discuss the investigation process and any other matters relevant to the investigation. If you have chosen to remain anonymous, your identity will not be disclosed to any other person, and the Company will conduct the investigation based on the information provided to it.

PROTECTION OF WHISTLEBLOWERS

The Company is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

➤ Protection against Detrimental Conduct

The Company (or any person engaged by the Company) will not engage in 'Detrimental Conduct' against you if you have made a disclosure under this policy.

Detrimental Conduct includes actual or threatened Conduct such as the following (without limitation):

- Termination of employment;
- Injury to employment including demotion, disciplinary action;
- Alternation of position or duties;
- Discrimination;
- Harassment, bullying or intimidation; Victimization;
- Harm or injury including psychological harm; Damage to a person's property;
- Damage to a person's reputation;
- Damage to a person's business or financial position; or
- Any other damage to a person.

The Company also strictly prohibits all forms of Detrimental Conduct against any person involved in an investigation of a matter disclosed under the policy in response to their involvement in that investigation.

The Company will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where such Conduct is identified.

➤ Protection of Confidentiality

All information received from you will be treated confidentially and sensitively. You will not be required to provide your name when making a disclosure. To disclose on an anonymous basis, it is recommended that you use a pseudonym and contact the Company's internal point of contact in the manner outlined above. If you report on an anonymous basis, you will still qualify for the protections in this policy.

The Company will also take the following measures for protecting your identity:

- All paper and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to the disclosure will be limited to those directly involved in managing and investigating the disclosure;



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- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of your identity (subject to your consent) or information that is likely to lead to your identification;
- Communications and documents relating to the investigation of the disclosure will not be sent to an email address or to a printer that other staff can access; and
- Each person involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that unauthorized disclosure of your identity may be a criminal offence.

Suppose you are concerned that your identity has been disclosed in relation to a disclosure without your consent. In that case, you should inform the VP of Contracting and Compliance or the other eligible internal points of contact immediately.

OTHER MATTERS

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

Employees are encouraged to read this policy in conjunction with other relevant Company policies, including:

- Code of Business Ethics and Conduct
- Federal Contractor Compliance Training
- IDIQ Contract Compliance and Ethics Training
- Funding – Responsibility of working with taxpayers money
- Company Handbook

