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## Corporate Procedure

# Assignment and Investigation of Hotline Allegations

### 1. Objective

The objective of this Procedure is to establish the process for assigning allegations reported to ClearStar (“Company”) Financial Accuracy and Compliance Hotline (the “Hotline”) to designated individuals appropriate to each type of allegation in order to ensure that each allegation is investigated in an effective and timely manner.

### 2. Audience

This Procedure applies to the Company and its wholly owned subsidiaries. The Company reserves the right to change, modify, add or remove portions of this Procedure at any time. Failure to comply with this Procedure could result in consequences including, but not limited to, termination of employment.

### 3. Definitions

#### 3.1 Allegation

An allegation is a claim of wrongdoing made by a Company officer, director, employee or contractor to the Company’s Hotline (855) 638-8895. The allegations shall be handled by the CEO, CFO, COO, General Counsel and/or Human Resources as provided for in Section 4.1 below.

### 4. Assignment of Allegations

- 4.1 Each Allegation reported to the Company Hotline shall be assigned by the Human Resources Department based upon the type of allegation.

	Type of Allegation	Designated Individuals
4.1.1	Discrimination	Head of Human Resources
4.1.2	Harassment - Sexual	Head of Human Resources
4.1.3	Harassment - Workplace	Head of Human Resources
4.1.4	Retaliation or Retribution	General Counsel Head of Human Resources
4.1.5	Conflict of Interest - Personal	General Counsel Head of Human Resources
4.1.6	Inappropriate Behavior	Head of Human Resources
4.1.7	Unfair Employment Practices	Head of Human Resources General Counsel COO
4.1.8	Environment, Health and Safety	Head of Human Resources COO
4.1.9	Substance Abuse	Head of Human Resources
4.1.10	Threats and Physical Violence	Head of Human Resources
4.1.11	Accounting and Auditing Practices	CFO General Counsel Chairman of the Audit Committee

4.1.12	Conflict of Interest - Financial	CFO General Counsel Chairman of the Audit Committee
4.1.13	Gifts, Bribes and Kickbacks	General Counsel
4.1.14	Trading on Inside Information	CFO General Counsel
4.1.15	Customer Relations	COO
4.1.16	Disclosure of Confidential Information	General Counsel
4.1.17	Fraud or Embezzlement	CFO General Counsel Chairman of the Audit Committee
4.1.18	Misuse of Resources	CFO COO General Counsel Head of Human Resources
4.1.19	Theft	Head of Human Resources COO General Counsel
4.1.20	Guidance Request - Legal or Regulatory	General Counsel
4.1.21	Other - Miscellaneous	Head of Human Resources General Counsel COO
4.1.22	Antitrust	CEO General Counsel
4.1.23	Espionage or Sabotage	CEO General Counsel
4.1.24	Falsification or Destruction of Information	General Counsel
4.1.25	Quality Control	COO

- 4.2 Each designated individual shall promptly investigate all assigned allegations and provide regular updates to the CEO until the investigation is concluded.
- 4.3 Upon conclusion of the investigation of an allegation, the designated individual shall notify the CEO of the results of the investigation and any remediation plans.

## 5. Audit and Enforcement

The Internal Audit Department shall perform periodic audits of the compliance with this Procedure. Failure to comply with this Procedure could result in disciplinary action, including termination of employment.

## 6. Policy History

Last Reviewed/Update	Owner	Section	Summary
June 12 24, 2024	General Counsel	All	Policy approved by the Board of Directors on 10/27/14.