



Stenson Tamaddon Anti-Retaliation Policy

February 2, 2024

I. Introduction

Policy Statement. We encourage all employees to speak up and report anything that may violate the law or our Company's policies without fear of retaliation. StenTam takes all complaints and concerns seriously and is dedicated to addressing them promptly and impartially. StenTam has zero tolerance for retaliation in any form against any person who makes a complaint or raises a concern in good faith.

II. Policy

1. Speak Up. StenTam is dedicated to fostering and maintaining the highest standards of ethics, integrity, and compliance in all aspects of our business. Our commitment to these principles includes ensuring that employees have a safe and secure avenue to report any concerns. Every employee is encouraged and expected to report any actual or suspected violation of this Code of Ethics, Company policies, standards, or procedures, or the law. Any person who learns of or suspects a violation of this Code, Company policies, standards, or procedures, or the law or regulations should report such suspicion or concern promptly via the following channels:

- a. The Legal Department, including the Chief Legal Officer, his designee, or any Compliance professional;
- b. Human Resources;
- c. Any executive or supervisor; or
- d. StenTam's Speak Up Hotline (855.662.SAFE with Code: 8320806617).

When using the Hotline, reporters may elect to remain anonymous. We encourage all reporters to provide a means to contact you in your report. The confidentiality of all reports—whether made anonymously or not—will be respected and will be limited to only those people who have a legitimate reason to know. Providing your contact information will permit us to keep the reporter informed of investigative progress and permit us to seek additional information. Nonetheless, we will always accept anonymous reports.

2. Anti-Retaliation. StenTam has zero tolerance for retaliation in any form. Retaliation includes but is not limited to adverse employment actions, discrimination, or harassment. Anyone engaging in retaliatory behavior against those who make a report in good faith will be subject to disciplinary action, up to and including termination. StenTam will not retaliate or permit retaliation against a person who in good faith:

- a. Reports what he or she believes is a violation of our Code, our policies, standards, or procedures, or the law;

b. Raises a compliance question or seeks advice about a particular business practice, decision, or action; or

c. Cooperates in an investigation of an actual or suspected violation.

3. If any person believes he/she has been subjected to any retaliation, then it should be reported, as set forth above. StenTam does not tolerate any retaliation or threat of retaliation. All allegations are taken seriously and will be investigated consistent with StenTam's policy for conducting internal investigations.

III. Violation of this Policy

Violation of this policy may result in disciplinary action, up to and including termination of employment.

The StenTam Chief Legal Officer is the proponent of this policy. Any questions concerning this policy should be addressed to the Chief Legal Officer, or his designee.