



Reporting Business Conduct Concerns

At Accelelevation, we believe in doing business the right way—honestly, ethically, and in compliance with all applicable laws and regulations. We are committed to creating a workplace where people feel comfortable speaking up and having open conversations about how we do business. We follow all applicable laws that protect employees from discrimination or retaliation when they report concerns in good faith or participate in investigations related to potential misconduct, including fraud or violations of law. To support this, Accelelevation has adopted this Policy on Reporting Business Conduct Concerns.

Scope, Purpose, and Speaking Up

This policy applies to all employees, officers, directors, contractors, and consultants of Accelelevation and serves to ensure that a mechanism exists for individuals to report in good faith any suspected wrongdoing, misconduct, or violation of law or company policy, without fear of retaliation.

If you have knowledge of, or a good-faith basis to suspect, a violation of Accelelevation's policies, ethical standards, legal or regulatory obligations, or other wrongdoing, you are encouraged to speak up. Accelelevation is committed to maintaining an environment where individuals feel comfortable reporting concerns so that the company is enabled to review, investigate, and address them appropriately.

Reports may include, but are not limited to, actual or suspected wrongdoing involving:

- Fraud, theft, or embezzlement
- Bribery, kickbacks, or improper payments
- Violations of health, safety, or environmental laws
- Accounting irregularities or financial misstatements
- Misuse of company assets or confidential information
- Discrimination, harassment, or retaliation
- Any violation of federal, state, or local law
- Any other unethical or improper conduct

Reporting Obligations and Procedure

Employees or other stakeholders who become aware of or suspect misconduct should report it promptly. Reports may be made confidentially and without fear of retaliation using the link at the Business Conduct Concerns Reporting Page, which can be accessed at www.accelelevation.com/compliance, or via telephone by calling our hotline, managed by Red Flag Reporting, at +1-888-727-0785.

Reports by employees may also be made in person to your manager, your HR Business Partner, a member of the legal or compliance teams, or another designated company representative. When you make a report, you are encouraged to include as much detail as you are able, so that any subsequent investigation can be conducted as effectively and efficiently as possible.

Confidentiality and Investigation of Reports

All reports will be reviewed promptly and handled as discreetly as possible. Accelevation will make every reasonable effort to protect the confidentiality of the individual making a report, consistent with the need to conduct a thorough investigation and comply with applicable laws. If you choose to report anonymously through our telephone hotline or the link at the Business Conduct Concerns Reporting Page, know that calls are never recorded and that phone numbers and IP addresses are not logged.

Accelevation will also ensure a fair and impartial investigation of any report received. Depending upon the nature and seriousness of the situation, the company may consult with appropriate internal or external resources or specialists as needed. If corrective or disciplinary action is warranted, such action will be taken in accordance with this policy and any applicable laws.

Non-Retaliation

Accelevation strictly prohibits retaliation against any individual, including stakeholders outside Accelevation, who in good faith report a suspected violation, participate in an investigation, or assist in any related proceeding. Retaliation in any form is a violation of this policy. Any employee who engages in retaliatory conduct may be subject to disciplinary action, up to and including termination of employment. For purposes of this policy, “good faith” means that the individual has a reasonable basis to believe that the information reported may indicate a potential violation, even if the concern is ultimately not substantiated.

False or Malicious Reports

Reports made in bad faith, with malicious intent, or with knowledge that the allegations are false, may result in disciplinary action, up to and including termination of employment.

Interaction with other Policies

It is important to remember that this policy is just one part of Accelevation’s overall approach to ethics and compliance. Accelevation also maintains additional policies and procedures related to appropriate business conduct, and we expect our employees, officers, directors, and contractors to be familiar with each of these and to adhere to the guidance and requirements set forth within them.