



1. **Purpose.** This Policy establishes requirements and procedures for reporting, investigating, and remedying suspected wrongdoing in the workplace and provides assurance that employees can raise genuine concerns without fear of reprisals, even if the concerns are mistaken.
2. **Effective Date.** October 2023.
3. **Audience.** All Destination Pet employees, officers, directors, contractors and individuals working for Destination Pet in any capacity.
4. **Policy.** The purpose of this policy is to reinforce business integrity by providing a safe and reliable means for employees and others to report concerns they may have about conduct at Destination Pet. By following this policy, an individual can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment.
 - 4.1 Suspected violations of our Code of Conduct or Business Integrity Policy, which we refer to in this policy as "Ethics Violations."
 - 4.2 Suspected violations of any other company policies or procedures, which we refer to in this policy as "Corporate Policy Violations."
 - 4.3 Questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information, which we refer to in this policy as "Fraudulent Auditing and Accounting Activities."
 - 4.4 Suspected violations of law or fraudulent activities other than Fraudulent Auditing and Accounting Activities, which we refer to in this policy as "Legal Violations," and collectively with Ethics Violations and Corporate Policy Violations as "Violations."

If requested, we also ask that you provide truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body,



as required under the Code of Conduct. If you are aware of a Violation or Fraudulent Auditing and Accounting Activity and do not report it according to this policy, your inaction may be considered a Violation itself, which could result in disciplinary action, up to and including termination of your employment or any other relationship that you may have with Destination Pet.

5. **Reporting and Investigation.** If you believe that any Violation or Fraudulent Auditing and Accounting Activity has occurred or is occurring, we encourage you to promptly take one of more of the following actions:

5.1 Discuss the situation with your manager.

5.2 If you do not believe your concern is being adequately addressed by your manager, or you are not comfortable speaking with either your manager or the Human Resources Department in lieu of your manager, report your concern using the method below where you may choose to identify yourself or remain anonymous:

- ✿ Website: <https://www.lighthouse-services.com/destpet>
- ✿ Anonymous Reporting App: Keyword: destpet (Detailed app instructions download here)
- ✿ Toll-Free Telephone:
 - English-speaking USA and Canada: 833-203-6462
 - Spanish-speaking USA and Canada: 800-216-1288
- ✿ E-mail: reports@lighthouse-services.com (must include company name with report)
- ✿ Fax: 215-689-3885 (must include company name with report)

This policy provides a mechanism for Destination Pet to be made aware of any alleged wrongdoings and address them as soon as possible and it is critical to the Company's success that reports are made internally so that the Company has the chance to investigate. However, nothing in this policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state law has occurred.



Receipt of the report will be acknowledged to the sender within a reasonable period following receipt if the sender supplied an address for the response.

All reports of a Violation or Fraudulent Auditing and Accounting Activity will be taken seriously and will be promptly and thoroughly investigated. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation, based on the circumstances reported by the sender, the Company may engage independent, external investigators if it deems such action is necessary. If the Company determines any investigation is necessary based on the report, it will provide periodic updates to the sender and provide a final update upon conclusion of the investigation (in all cases to the extent practicable and legally permissible).

If a Violation or Fraudulent Auditing and Accounting Activity has been reported, investigated, and confirmed, the Company will take prompt corrective action proportionate to the seriousness of the offense. This action may include disciplinary action against the accused party, up to and including termination of employment or any other working relationship that the offending party may have with Destination Pet. Reasonable and necessary steps will also be taken to prevent any further Violation or Fraudulent Auditing and Accounting Activity.

However, a party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment or other legal proceedings.

6. **Confidentiality.** Information disclosed during the course of the investigation will, to the extent practical and appropriate, remain confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law. For any Violation or Fraudulent Auditing and Accounting Activity not reported through an anonymous report, we will advise the reporting party that their report has been addressed and, if we can, provide the specific resolution. However, due to confidentiality obligations, there may be times when we cannot provide the details regarding the corrective or disciplinary action taken.



7. **No Retaliation.** Destination Pet strictly prohibits and does not tolerate retaliation against any employee, officer, director, or independent contractor for reporting a Violation or Fraudulent Auditing and Accounting Activity or suspected Violation or Fraudulent Auditing and Accounting Activity in good faith or otherwise cooperating in an investigation of a Violation or Fraudulent Auditing and Accounting Activity. All forms of retaliation are prohibited, including any form of adverse action, discipline, threats, intimidation, or other form of retaliation for reporting under or complying with this Policy. Destination Pet considers retaliation a Violation itself, which will result in disciplinary action, up to and including termination of employment or any other working relationship with Destination Pet.

If you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to an alleged Violation or Fraudulent Auditing and Accounting Activity, please immediately report the alleged retaliation to the Chief Human Resources Officer. If, for any reason, you do not feel comfortable discussing the alleged retaliation with The Chief Human Resources Officer, please report the alleged retaliation through the ethics or reporting hotline, whose information is provided earlier in Section 4 of this policy.

No employee will be subject to liability or retaliation for disclosing a trade secret if it is done in compliance with 18 U.S.C. §1833 and is made either: (1) in confidence to a federal, state, or local government official or to an attorney solely for the purpose of making a report in compliance with this Policy or participating in any investigation relating to an alleged Violation or Fraudulent Auditing and Accounting Activity; or, (2) in a complaint or other document filed in a lawsuit or other proceeding under seal.