

WHISTLEBLOWER POLICY

Polar Dynamics Robotics, Inc.

Effective Date: January 15, 2024

Policy Number: GOV-2024-001

1. PURPOSE AND SCOPE

1. Polar Dynamics Robotics, Inc. (the "Company") is committed to maintaining the highest standards of business conduct and ethics. This Whistleblower Policy (the "Policy") establishes procedures for the receipt, retention, and treatment of complaints regarding actual or suspected violations of:

- (a) Federal, state, or local laws and regulations;
- (b) The Company's Code of Business Conduct and Ethics;
- (c) The Company's internal accounting controls or auditing matters;
- (d) Safety protocols related to autonomous mobile robot operations;
- (e) Proprietary technology protection measures; and
- (f) Environmental and workplace safety regulations.

2. This Policy applies to all employees, officers, directors, contractors, consultants, and agents of the Company (collectively, "Covered Persons").

2. REPORTABLE MATTERS

1. Covered Persons should report any reasonable concerns regarding:

- (a) Financial irregularities, including fraud, theft, or manipulation of Company financial data;
- (b) Violations of safety protocols in robot manufacturing or deployment;
- (c) Unauthorized disclosure of proprietary cold-environment navigation technology;
- (d) Environmental compliance violations in manufacturing facilities;
- (e) Workplace harassment or discrimination;
- (f) Conflicts of interest;
- (g) Bribery or corruption; and
- (h) Retaliation against whistleblowers.

3. REPORTING PROCEDURES

1. Internal Reporting Channels:

- Direct supervisor or department head
- Human Resources Department
- Legal Department
- Ethics Hotline: 1-800-POLAR-ETHICS
- Dedicated email: whistleblower@polardynamics.com

2. External Reporting Channel:

Independent third-party reporting service:

Ethics Point Portal (www.polardynamics.ethicspoint.com)

3. Anonymous Reporting:

Reporters may choose to remain anonymous when submitting complaints through the Ethics Hotline or Ethics Point Portal.

4. INVESTIGATION PROCEDURES

1. The Ethics Committee, comprising the Chief Legal Officer, Chief Compliance Officer, and Head of Internal Audit, shall:

- (a) Review all whistleblower complaints within 48 hours of receipt;
- (b) Determine appropriate investigation scope and methodology;
- (c) Assign qualified investigators;
- (d) Maintain confidentiality throughout the investigation;
- (e) Document findings and recommended actions;
- (f) Report significant matters to the Audit Committee of the Board of Directors.

2. Investigation Timeline:

- Initial Assessment: 48 hours
- Investigation Initiation: 5 business days
- Status Updates: Every 15 days
- Target Resolution: 60 days

5. CONFIDENTIALITY AND NON-RETALIATION

1. Confidentiality Protection:

The Company will maintain the confidentiality of the reporter's identity to the fullest extent possible, consistent with conducting a thorough investigation and applicable legal requirements.

2. Non-Retaliation Commitment:

The Company strictly prohibits any form of retaliation against individuals who:

- (a) Make good-faith reports of suspected violations;
- (b) Participate in investigations;
- (c) Refuse to participate in suspected illegal activities.

3. Retaliation Protection:

Protected activities include:

- Filing a complaint
- Testifying in investigations
- Assisting in proceedings
- Opposing prohibited practices

6. DOCUMENTATION AND RETENTION

1. The Ethics Committee shall maintain records of:

- (a) All reported concerns
- (b) Investigation documents
- (c) Interview notes
- (d) Final reports
- (e) Corrective actions taken

2. Record Retention:

All whistleblower-related records shall be retained for seven (7) years from the date of case closure.

7. POLICY ADMINISTRATION

1. The Chief Legal Officer shall:

- (a) Review this Policy annually
- (b) Recommend updates to the Board
- (c) Oversee Policy implementation

(d) Provide training to employees

2. Questions regarding this Policy should be directed to:

Legal Department

Polar Dynamics Robotics, Inc.

Email: legal@polardynamics.com

8. AMENDMENTS

This Policy may be amended only by resolution of the Board of Directors of Polar Dynamics Robotics, Inc.

9. ACKNOWLEDGMENT

By continuing employment or service with the Company, all Covered Persons acknowledge their understanding of and compliance with this Policy.

Approved by the Board of Directors

Date: January 15, 2024

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Katherine Wells

Chief Financial Officer

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Elena Frost, Ph.D.

Chief Executive Officer